

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

United States of America,)	
)	File Nos.
Plaintiff,)	17CR107(1) (4) (5) (16)
)	(20)
)	(DWF/KMM)
vs.)	
)	
Michael Morris, Pawinee)	St. Paul, Minnesota
Unpradit, Saowapha Thinram,)	November 19, 2018
Thoucharin Ruttanamongkongul)	11:45 a.m.
and Waralee Wanless,)	
Defendants.		

BEFORE THE HONORABLE DONOVAN W. FRANK AND A JURY
UNITED STATES DISTRICT COURT JUDGE
(TRIAL TESTIMONY OF CHABAPRAI BOONLUEA)

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I N O P E N C O U R T

(Defendants present)

MS. PROVINZINO: The United States calls Chabaprai Boonluea. She is an in-custody witness, so it may take a while to get her set.

THE COURT: All right.

MS. PROVINZINO: And, Your Honor, as I indicated, this is an in-custody witness, so this Court may want to be prepared to give a cautionary instruction, if Defense so requests.

If you would like to give the jury a stretch break, I have no objection to that.

THE COURT: Yeah. You're free to stand up if you like.

And before you sit down, if you could raise your right hand, please.

(Sworn.)

THE WITNESS: I do.

THE COURT: Okay. Both may be seated.

And then if you could please state your full name.

THE WITNESS: My name is Chabaprai Boonluea.

THE COURT: You may inquire, Counsel.

MS. PROVINZINO: All right.

D I R E C T E X A M I N A T I O N

1 BY MS. PROVINZINO:

2 Q. And Ms. Boonluea, could you spell your name for the
3 record?

4 A. The name Chabaprai is C-H-A-B-A-P-R-A-I.

5 Q. And the last name, is that B-O-O-N-L-U-E-A, is that
6 correct?

7 A. Yes.

8 Q. And Ms. Boonluea, where are you from?

9 A. I came from Thailand.

10 Q. What part of Thailand?

11 A. Northeast of Thailand.

12 Q. And do you have a Thai nickname?

13 A. Yes, I do.

14 Q. And what is that?

15 A. Named Chaba and Ploy.

16 Q. And C-H-A-B-A, is that right?

17 A. Correct.

18 Q. And Ploy, is that P-L-O-Y?

19 A. Yes.

20 Q. And do you have an American nickname?

21 A. I do.

22 Q. And what is that?

23 A. There were Lily and Iris.

24 Q. Okay. And did you have any working name that you would
25 use when you were working for the organization?

1 A. I do.

2 Q. And what is your working name or working names?

3 A. It was Lily.

4 Q. Lily, either L-I-L-Y or L-I-L-L-Y, is that right?

5 A. L-I-L-Y.

6 Q. And thank you for correcting that. And what would you
7 prefer your name testimony today?

8 A. Iris, please.

9 Q. So, Iris, is it fair to say to say that you speak some
10 English but Thai is your first language?

11 A. Thai is better.

12 Q. Okay. So we'll have you testify in Thai with use of the
13 interpreter, is that fair?

14 A. Okay.

15 Q. Okay. And you are here, Iris, to talk about a sex
16 trafficking organization, is that right?

17 A. Yes.

18 Q. Were you a member of this organization?

19 A. Yes, I was.

20 Q. Did you serve as a house boss for this organization?

21 A. I was.

22 Q. And where did you serve as a house boss?

23 A. In Atlanta, Georgia.

24 Q. Did you also help this organization here in Minnesota?

25 A. I did.

1 Q. In October of 2016, Iris, what happened to you?

2 A. I was arrested by the law enforcement.

3 Q. Where were you arrested?

4 A. In Atlanta, Georgia.

5 Q. And what happened after you were arrested in Georgia?

6 A. The agent had put me in the custody in Atlanta for
7 10 days.

8 Q. Okay. And then at some point were you transferred here
9 to Minnesota?

10 A. Yes.

11 Q. And I see you have a blue uniform on, have you been in
12 custody since that arrest in October of 2016?

13 A. Yes.

14 Q. And where are you currently held?

15 A. Sherburne.

16 Q. You're referring to Sherburne County Jail, is that
17 right?

18 A. Yes.

19 Q. So you, along with others, have been charged out of
20 District of Minnesota with crimes, is that right?

21 A. Yes.

22 Q. And you were charged with a range of crimes, including
23 sex trafficking conspiracy and money laundering conspiracy,
24 is that right?

25 A. Yes.

1 Q. Iris, are you guilty of those crimes?

2 A. I was.

3 Q. Now after you were transported here to Minnesota, very
4 early on did you agree to sit down with the Government and
5 cooperate?

6 A. Yes.

7 Q. Why did you agree to do that?

8 A. I wanted to speak the truth to the government to hear
9 it all.

10 Q. And so what is your responsibility as someone who
11 cooperates with the Government?

12 A. I don't understand the question.

13 Q. Okay. And so you said you wanted to speak the truth to
14 the Government, is that why you're cooperating?

15 A. Yes.

16 Q. And is that your job as a cooperator?

17 A. Yes.

18 Q. And so we -- is it fair to tell the jury that we have
19 met many times for many hours?

20 A. Yes.

21 Q. And you've told us all the things you've done in terms
22 of money laundering and sex trafficking?

23 A. Yes.

24 Q. And we've talked a lot about other people, is that true?

25 A. Yes.

1 Q. And Iris, there are five people here on trial today.

2 Are you aware of that?

3 A. I do know.

4 Q. Now is the criminal conspiracy bigger than just the five
5 people here sitting at Defense Counsel table?

6 A. There are more.

7 Q. And do you know everyone?

8 A. I don't know everyone.

9 Q. Do you know all the different roles people played?

10 A. No, I do not.

11 Q. And when we met, is it fair that you'd tell us if you
12 didn't know someone?

13 A. Yes.

14 Q. But in terms of the rules, you couldn't just answer the
15 questions you wanted to, is that right?

16 A. That's correct.

17 Q. You had to talk about everyone if you had information,
18 true?

19 A. Yes.

20 Q. Now, at some point, Iris, did you plead guilty?

21 A. Yes, I did.

22 Q. Why did you do that?

23 A. Because I have done something wrong and I admitted to
24 my guilt.

25 Q. And you admitted your guilt to the sex trafficking

1 conspiracy, is that right?

2 A. Yes.

3 Q. And you admitted your guilt to being part of a money
4 laundering conspiracy, is that right?

5 A. Yes.

6 Q. Now at the same time you entered your guilty plea, did
7 you also enter into a cooperation agreement?

8 A. Yes.

9 Q. And what do you have to do under the cooperation
10 agreement?

11 A. Speak the whole truth and nothing to held back.

12 Q. So it's even the case if the truth makes you look bad,
13 is that fair?

14 A. Yes.

15 Q. Now you were arrested quite a while ago and pled guilty
16 quite a while ago. Have you been sentenced, yet, Iris?

17 A. Not yet.

18 Q. And you know you're facing a lot of time in prison, is
19 that fair?

20 A. I do know that.

21 Q. At this point in time, do you know what your sentence
22 will be?

23 A. I don't know.

24 Q. And did the Government promise you what your sentence
25 would be?

1 A. No. They did not promise me.

2 Q. But you hope that by testifying today you will get a
3 shorter sentence, is that -- is that right?

4 A. Yes.

5 Q. And Iris, who's ultimately going to be sentencing you?

6 A. Judge Frank.

7 MS. PROVINZINO: So at this time if the Court
8 could provide its limiting instruction?

9 THE COURT: If that's acceptable to Counsel?

10 MR. SICOLI: Yes, Your Honor.

11 THE COURT: Members of the Jury, the -- you are
12 hearing evidence that this witness pled guilty to a crime
13 which arose out of some of the events for which the
14 Defendants before you are on trial.

15 It's for -- you may not consider the guilty plea
16 as evidence of the other Defendant's guilt. You may
17 consider this witness's guilty plea for the purpose of
18 determining how much, if at all, to rely on your testimony.
19 And you are hearing testimony also that she -- she has
20 entered into a cooperation agreement in hopes to receive a
21 reduced sentence because of that agreement with the
22 Government.

23 As I've told you before in such cases, it's up to
24 the Court, in this case myself, to decide whether to reduce
25 the sentence. And if so, how much to reduce it by.

1 You may give the testimony of this witness such
2 weight that you think it deserves. Whether or not the
3 testimony of a witness may have been influenced by the hopes
4 of receiving a reduced sentence is by you, though, the jury
5 to decide.

6 MS. PROVINZINO: Thank you, Your Honor.

7 BY MS. PROVINZINO:

8 Q. All right. Iris, let's talk about the criminal
9 organization.

10 And in your testimony we're going to focus on the
11 Defendants on trial.

12 A. Yes.

13 Q. But let's start on some background on you so the jury
14 gets a chance to know who you are.

15 A. Yes.

16 Q. Tell the jury about where you grew up.

17 A. I grew up Buriram Province.

18 Q. And what did your parents do in Buriram Province?

19 A. They were farmers.

20 Q. And what type of farming did they do?

21 A. Rice farming.

22 Q. Do you have any siblings, Iris?

23 A. Yes, I do.

24 Q. And what is your order -- birth order?

25 A. I'm the first one.

1 Q. And what about your other siblings?

2 A. I don't understand what do you mean.

3 Q. Well, that was a bad question. So you're the oldest.
4 Tell the jury about your other two siblings?

5 A. I'm the oldest. I have one younger sister and one
6 younger brother.

7 Q. How far did you go in school, Iris?

8 A. I got up to only to ninth grade.

9 Q. And so -- at what age would that be in Thailand going
10 through or completing the ninth grade?

11 A. 15 year old.

12 Q. So at 15 years old then, when you're no longer in
13 school, what did you do?

14 A. I traveled to Bangkok.

15 Q. And why did you travel to Bangkok?

16 A. To find a job.

17 Q. Did you find a job?

18 A. Yes, I did.

19 Q. And what did you do, Iris?

20 A. My first job was to working at plastic manufacturing.

21 Q. Okay. Was that in a factory of some sort?

22 A. It was a small factory, family-owned.

23 Q. And how much money would you make working in the plastic
24 factory?

25 A. I made 40 baht a day. And I worked eight hours a

1 day.

2 Q. And 40 baht a day, just so the jury understands, was
3 that a little more than -- or would that be a little more
4 than 1 U.S. dollar a day?

5 A. Yes.

6 Q. And in addition to working in the plastic factory, did
7 you have any other jobs in Bangkok?

8 A. I did.

9 Q. And what were those, Iris?

10 A. When I got into 18 year old, I had applied to a
11 textile garment industry.

12 Q. And what was your job in the textile or garment
13 industry?

14 A. I sold clothing.

15 Q. And was that similar schedule, eight hours a day?

16 A. Yes.

17 Q. And what was your pay for your job of sewing?

18 A. 120 baht a day.

19 Q. So fair to say that would be a little more than 3 -- or
20 between \$3 and \$4 a day?

21 A. Yes.

22 Q. Okay. While you're working in Bangkok, where is your --
23 the rest of your family?

24 A. They were still in Buriram.

25 Q. Did you take other jobs in Bangkok?

1 A. Yes, there was.

2 Q. And what else, Iris?

3 A. When I was 20 year old, I had applied to electronic
4 manufacturing.

5 Q. And did you get that job?

6 A. Yes, I did.

7 Q. Now, at some point in time, did your family move from
8 Buriram?

9 A. Yes.

10 Q. And where did they move?

11 A. They moved to Bangkok.

12 Q. Okay. They left farming. What were they doing then in
13 Bangkok?

14 A. They came to sell food on the street.

15 Q. Did you help with that?

16 A. Yes, I did.

17 Q. And did you continue to work in Bangkok outside of
18 selling food on the street?

19 A. Yes.

20 Q. And what type of job was that?

21 A. At the time I was still working at the electronic
22 manufacturing. It's about making phone parts.

23 Q. Okay. At some point in time, did you get involved in
24 real estate work?

25 A. Yes.

1 Q. When did you do that?

2 A. When I turned into 22 year old.

3 Q. And where did you do that?

4 A. It was in Bangkok.

5 Q. And what were your responsibilities in real estate?

6 A. I was a real estate agent.

7 Q. And what did you do as a real estate agent?

8 A. I would collect the document from the customer to
9 pass on to the bank. And take the customer to change the
10 title at the land department.

11 Q. And how long did you do that work?

12 A. 13 years.

13 Q. Okay. And did you continue to do that on up to when you
14 came to the United States?

15 A. Yes.

16 Q. So let's talk about -- so your family's now in Bangkok
17 at this time, is that right?

18 A. Yes.

19 Q. And what was happening in your family at the time?

20 A. My mother got sick.

21 Q. And tell the jury about that?

22 A. My mother got sick with a heart disease. For so many
23 years.

24 And there was a need for money to have a surgery
25 to change something inside.

1 Q. And did you help with that? Getting money for the
2 surgery?

3 A. Yes, I did.

4 Q. And what was your role in that, Iris?

5 A. I tried to make money in every way that I can so that
6 I could help my mother to go to see the doctor.

7 Q. Okay. And what were you doing to make money to help
8 your mom?

9 A. I was still working as a real estate agent selling
10 houses as much as I could, so I could make a lot of
11 commission.

12 Q. Okay. And when you talk about commission, what were you
13 making on a monthly basis doing real estate work?

14 A. My salary was between 6,000 to 10,000 baht. The
15 commission I got was 2 percent per one house that I sold.

16 Q. Okay. And when you give that range of 6,000 to 10,000,
17 is that somewhere between \$200 and \$350 a month, roughly?

18 A. Yes.

19 Q. Was that money enough to cover your mother's medical
20 costs?

21 A. No, it was not.

22 Q. So what did you do to look for ways to help cover those
23 medical costs for your mom? What happened?

24 A. My family had put the land deed with the bank so that
25 we can get the loan out.

1 Q. Okay. So this is the farmland you had in Buriram
2 Province, is that right?

3 A. Yes.

4 Q. So your family was trying to sell that land to get some
5 money for your mom's surgery, is that right?

6 A. Yes.

7 Q. Or to get a loan on that land, is that right?

8 A. Yes.

9 Q. Did you have any responsibilities relating to that land
10 transaction?

11 A. No, I was not.

12 Q. And so you started -- you had met some people through
13 selling houses and other and property, is that right? In
14 your work in real estate?

15 A. Yes.

16 Q. This might be a good place to stop.

17 THE COURT: All right.

18 MS. PROVINZINO: Otherwise we could continue for a
19 few more minutes, Your Honor.

20 THE COURT: Okay. We can break here, if that's
21 acceptable to everyone.

22 So Members of the Jury, we'll take -- it's about
23 12:15. So we'll -- we'll stand in recess until 1:20.

24 And so we'll stand in recess until that time.

25 Please rise for the jury.

1 (Jurors excused at 12:14 p.m.)

2 THE COURT: And the witness -- the witness is
3 excused. May step down until 1:20.

4 Anything further additional by Counsel? All
5 right.

6 MS. PROVINZINO: Not from the Government, Your
7 Honor.

8 THE COURT: We will see you at 1:20. I'll have
9 Lori check in with you a few moments before just in case,
10 but we'll see you at 1:20.

11 (In open court at 1:22 p.m.)

12 MS. PROVINZINO: Thank you, Your Honor.

13 BY MS. PROVINZINO:

14 Q. Welcome back, Iris.

15 Before our lunch break we were just getting to the
16 point where you met someone who could help you to get to the
17 United States. I want to walk the jury through that
18 process.

19 So you, through your real estate, work met someone
20 who told you they could help you get some money, is that
21 right?

22 A. Yes.

23 Q. Who was it who could help you?

24 A. A person named Teow.

25 Q. Before you met Teow, was there somebody else who you had

1 sold a house to who offered to help?

2 A. There was.

3 Q. Okay. And who was that?

4 A. It's a woman who live in the same complex. Her name
5 was Keang.

6 Q. And so we're clear, we're not talking the Kung, Saowapa
7 Thinram, here on trial, correct?

8 A. That's correct.

9 Q. So how did that Keang inform you that she could help?

10 A. She had come to me and offered me -- convinced me to
11 go sell sex in Spain.

12 Q. And were you able to go to Spain?

13 A. I did not go.

14 Q. And why not?

15 A. The person who handled the document notify me that
16 the Visa had not passed.

17 Q. Okay. Did you learn then about the possibility of going
18 to the United States to sell sex?

19 A. Yes.

20 Q. What did you learn?

21 A. So she told Teow that I wanted to come sell sex in
22 America.

23 Q. And when we're talking about Teow, is that the T-E-O-W.

24 A. I don't know how to spell it but she was a female.

25 Q. So that's a female?

1 A. Yes.

2 Q. All right. Iris, I'm approaching with Government
3 Exhibits 10 and 11.

4 A. Yes.

5 Q. And I think it would be helpful to clarify, who that
6 individual is.

7 And do you recognize the person in this
8 photograph?

9 A. I do.

10 Q. And hat's the female Teow?

11 A. Yes.

12 Q. And just so the jury can distinguish, I will refer to
13 her as Teow. Is that fair?

14 A. Yes.

15 Q. And I will show her photo to the jury. So how did you
16 meet Teow?

17 A. She had called to contact me.

18 Q. Did you meet with her?

19 A. I did.

20 Q. And where did you meet?

21 A. In Bangkok.

22 Q. And where in Bangkok?

23 A. I don't remember the area. But it was somewhere in
24 the mall.

25 Q. And did Teow know the situation about your family?

1 A. Yes, she did.

2 Q. And what did she tell you about coming to the United
3 States to sell sex?

4 A. She told me that I had to meet with a man so that we
5 could make agreement as to how much debt I would have to
6 pay to come here.

7 Q. And what did you understand about the debt to come to
8 the United States?

9 A. That I had to come here to work off my debt.

10 Q. Okay. And did you know how much the debt would be?

11 A. Yes, I do.

12 Q. And what did you understand the amount to be?

13 A. 60,000 U.S. dollars.

14 Q. And did you meet with this man that Teow had suggested?

15 A. I did.

16 Q. And who was it?

17 A. Khun Tu.

18 Q. Okay. And so this Tu is a male, is that right?

19 A. Yes.

20 And may I approach with Government Exhibit 1069?

21 THE COURT: You may.

22 BY MS. PROVINZINO:

23 Q. And there are two photographs as part of Government
24 Exhibit's 1069, that has already been admitted into
25 evidence.

1 And do you recognize the individual portrayed in
2 Government Exhibit 1069?

3 A. I do.

4 Q. And who is it?

5 A. Khun Tu.

6 Q. And this is the Tu you met to talk about your debt?

7 A. Yes.

8 MS. PROVINZINO: The Government moves the
9 admission of the second part of Government Exhibit 1069, the
10 page -- second page of that.

11 MR. SICOLI: No objection.

12 MR. GERDTS: No objection.

13 THE COURT: It's received.

14 BY MS. PROVINZINO:

15 Q. So as the jury saw before, this is a photograph of Tu.

16 And I'm going to show you on the doc cam the new
17 portion of the exhibit.

18 Is it fair to say, Iris, you recognize him from
19 this photograph?

20 A. Yes.

21 Q. More than the other?

22 A. Yes.

23 Q. And at the top of that there's a string of red that says
24 June 16, 2009. Do you see that?

25 A. Yes.

1 Q. So what does Tu, the male, tell you about the debt?

2 A. So he told me that I would come to sell sex in
3 America. I had to pay off the debt for 60,000 U.S.
4 dollar. And I had to work off for about four to six
5 months.

6 Q. So you knew the amount and he told you it would take
7 about four to six months, is that right?

8 A. Yes.

9 Q. Did he tell you about how you would pay back the debt?

10 A. He said -- he said that I could come to work here and
11 gradually pay off my debt. I could work from four to six
12 months.

13 Q. Okay. And would each dollar you earned go to pay off
14 the debt?

15 A. Yes.

16 Q. Did he tell you anything about house fees?

17 A. No, he did not.

18 Q. Did he tell you anything about other expenses like for
19 transportation or food?

20 A. He did.

21 Q. And what did he tell you about those?

22 A. So he told me during the period of four to six months
23 there would be someone would bought me tickets and I
24 would be able to receive \$80 for food.

25 Q. And this debt -- this agreement that you were talking to

1 Tu about, was any of that written down?

2 A. No, there was not.

3 Q. Now you indicated you knew you would have to sell sex?

4 A. I did know that.

5 Q. And did he describe what you would actually have to do?

6 A. He said that if I ever have a boyfriend I would be
7 able to work as selling sex in America.

8 Q. But did he describe it like you'd be having sex with a
9 boyfriend?

10 A. Yes.

11 Q. Did he tell you anything else about the debt?

12 A. He told me that that there would be someone in
13 America that would notify me more about the detail.

14 Q. So at that point you had some limited information about
15 the debt and what you would be expected to do, is that
16 right?

17 A. Yes.

18 Q. And did the man, Tu, do anything further to get you
19 ready for the United States?

20 A. No, he didn't. But we came here together. We
21 traveled together.

22 Q. Okay. And I want to get that. But first talk about how
23 you actually got to the point where you could travel to the
24 United States.

25 Did the female Teow do anything further to help

1 you get to the United States?

2 A. Yes, she did.

3 Q. And what did she help you do?

4 A. She helped me to fill out the form. And she had me
5 walk the passport traveling to Hong Kong, Macau, China,
6 and also had somebody to marry to me.

7 Q. So let's take those in order. We'll start with the
8 Visa, then we'll get to the passport, and then we'll talk
9 about the marriage.

10 A. Yes.

11 Q. Iris, I'm approaching with Government Exhibit 105.

12 MS. PROVINZINO: Which I move into admission as a
13 Certified Public Accountant record.

14 MR. SICOLI: I'm sorry, which one is this?

15 MS. PROVINZINO: Government Exhibit 105.

16 MR. SICOLI: Okay.

17 MS. PROVINZINO: Any objection from Counsel?

18 MR. SICOLI: No objection.

19 MR. GERDTS: No objection.

20 MR. GUERRERO: No objection.

21 THE COURT: Received.

22 BY MS. PROVINZINO:

23 Q. Now, Iris, you have a hardcopy in front of you. I'll
24 also put it up on the screen so the jury can follow along.

25 Now, is this the type of form that the female Teow

1 helped you fill out?

2 A. Yes.

3 Q. So who is that?

4 A. It's me.

5 Q. And that's your true name and information about your
6 place of birth, right?

7 A. Yes.

8 Q. Okay. Now let's focus on this.

9 For the Visa application. Now this is information
10 about you, is that true?

11 A. Yes.

12 Q. And your date of birth, in January, 1974?

13 A. Yes.

14 Q. And where did Teow get the information to fill out that
15 record?

16 A. I had provided her.

17 Q. Okay. And so there's a reference here that you're a
18 director of finance. Is that right?

19 A. Yes.

20 Q. Was that your job?

21 A. No, it was not.

22 Q. So who put that information in your application?

23 A. Khun Teow did.

24 Q. At the top in Box 15, there's a home address listed.

25 A. Yes.

1 Q. And is that your true address?

2 A. It was not.

3 Q. Who's address was that?

4 A. I don't know.

5 Q. All right. And you mentioned that Teow filled this
6 information out, but also helped you with a marriage, is
7 that right?

8 A. Yes.

9 Q. And you see the reference here in Boxes 17 and 18
10 indicating that you're married?

11 A. Yes, I do.

12 Q. And who is Mr. Pradit Yooyen?

13 A. It's the person that Khun Teow found me to marry to
14 him.

15 Q. Had you ever met him before?

16 A. I never did.

17 Q. Tell me the jury about your interaction with Pradit
18 Yooyen?

19 A. I had never new him before until Khun Teow introduced
20 me to be married to him. And we had gone for -- request
21 applying for the Visa together.

22 Q. Okay. Did you get married?

23 A. We did.

24 Q. And did you ever have any sexual relations or consummate
25 the marriage?

1 A. No. There was not.

2 Q. And did Teow explained to you why you should get
3 married?

4 A. She did.

5 Q. What was the purpose of it?

6 A. So that the Visa to America would be easily approved.

7 Q. And it lists on Box 24 that you were intending to go to
8 the Hilton in San Francisco, is that right?

9 A. Yes.

10 Q. And I believe you listed the purpose of the trip. And
11 what was that?

12 A. I don't understand the question.

13 Q. And did you represent on this Visa application that the
14 purpose of your trip was a honeymoon with your husband?

15 A. Yes.

16 Q. And Iris, in asking you these questions, you didn't
17 actually fill in these answers in English, is that true?

18 A. That's correct.

19 Q. Did you fill in any of the information for this
20 application?

21 A. I did not.

22 Q. All right. So after you provide this information -- and
23 I want to scroll down -- let's see, sorry about that -- to
24 page -- let's see, this would be the last page, 6, of the
25 document. And there's some supplemental information here.

1 Okay. So is that your full name?

2 A. Yes.

3 Q. And then the -- your fake husband, true?

4 A. Yes.

5 Q. And there's some additional names listed here, and who
6 are they?

7 A. How does it read?

8 Q. Mr. Samien Boonluea and Mrs. Sommai Boonluea? I may be
9 mispronouncing those.

10 A. Mr. Samien is my father. Mrs. Sommai is my mother.

11 Q. And how did Teow get that information?

12 A. I have given it to her.

13 Q. So this application was prepared and sent, along with
14 your fake marriage.

15 And you had indicated one other thing that Teow
16 helped you do, and that was to walk your Visa, is that
17 right?

18 A. Yes.

19 Q. And what does that mean?

20 A. I don't understand the question.

21 Q. You said Teow helped you to walk your Visa to prepare
22 for your Visa application, is that right?

23 A. Yes.

24 Q. And how did she help you do that?

25 A. She helped me to fill out the form.

1 Q. And in part of filling out the form, did she suggest you
2 do some travel before applying for a Visa to the United
3 States?

4 MR. GERDTS: Objection, leading.

5 THE COURT: Sustained as to the form. She'll put
6 a new question in front of you.

7 BY MS. PROVINZINO:

8 Q. All right. You had mentioned several things that Teow
9 helped you do and that related to helping you get your Visa
10 to the United States.

11 A. That's correct.

12 Q. Did you do travel to other countries before coming to
13 the United States?

14 A. Yes, I did.

15 Q. Where did you go?

16 A. I went to Hong Kong, Macau, and China.

17 Q. Who suggested that?

18 A. Khun Teow had taken me there.

19 Q. And describe that to the jury. How did Khun Teow take
20 you there?

21 A. Khun Teow had taken me to all these three countries
22 so that my Visa would get stamped within thee days, so I
23 could apply to the Visa to America easier -- easily.

24 Q. After filing out that application, you're walking your
25 Visa and getting involved in the fake marriage, did you then

1 have a Visa interview?

2 A. Yes, there was.

3 Q. Were you prepared for the Visa interview?

4 A. Yes, I was.

5 Q. And who prepared you for that?

6 A. Khun Teow did.

7 Q. How did she prepare you for that?

8 A. She said I had to go with my husband. Walk with my
9 husband as if we were a real couple.

10 Q. And did you go to the interview?

11 A. I did.

12 Q. Were you with anyone?

13 A. I went with Mr. Pradit.

14 Q. And tell the jury about the Visa interview?

15 A. The officers at the embassy asked me what would I go
16 to the America for. And my husband told them that we
17 would go for a honeymoon.

18 Q. In this Visa interview, did you answer any of the
19 questions?

20 A. I don't remember. But most of the time they
21 interviewed my husband, my so-called husband.

22 Q. Okay. How did you find out that your Visa had been
23 approved?

24 A. The officer from the embassy sent me the Visa?

25 Q. And then at what point what did you do?

1 A. I was preparing to come to America.

2 Q. All right. And so one of the -- I'm going to read you
3 the note here.

4 It indicates that "Couple on honeymoon to San
5 Fran. Owns a catalog printing company. Husband has
6 previous regional and Europe travels." Is that right?

7 A. Yes.

8 Q. Did you own a catalog printing company?

9 A. No, I did not.

10 Q. Was that an answer your husband provided?

11 A. Yes.

12 Q. So you get the Visa and you're preparing to come to
13 America.

14 A. Yes.

15 Q. Do you do anything further with your fake husband, this
16 Mr. Pradit Yooyen?

17 A. We went to get divorce.

18 Q. And where did you do that?

19 A. At the district.

20 Q. So you got divorced before coming to the United States,
21 is that true?

22 A. Yes.

23 Q. All right. So we've got your Visa. Did Teow do
24 anything further to get you ready for the United States?

25 A. So I just was prepared to come to United States.

1 Q. Okay. And was part of that preparation having
2 photographs taken?

3 A. Oh, yes.

4 Q. And where did you go for that?

5 A. I went to a store called toilet.

6 Q. Did anyone come with you?

7 A. Khun Teow took me there.

8 Q. And why did she take you there?

9 A. She wanted me to take the pictures for using to sell
10 sex here.

11 Q. And so what type of photographs were taken?

12 A. It was sexual, provocative.

13 Q. And then did she have those photos?

14 A. Yes, she did.

15 Q. Or do you know what happened to those?

16 A. I don't -- I don't know.

17 Q. So now you're ready to go to the United States, is that
18 right?

19 A. Yes.

20 Q. So who did you fly with?

21 A. I flew with Khun Teow, Khun Tu and the husband.

22 Q. Okay. So Teow, is that right?

23 A. Yes.

24 Q. And Tu?

25 A. Yes.

1 Q. And the fake husband.

2 A. Yes.

3 Q. Focusing on Tu for a minute on the screen in front of
4 you. Does he have a relationship with anyone else in the
5 organization?

6 A. He was a significant other to Khun M.

7 Q. All right. So you get on the plane and where do you
8 guys go?

9 A. We arrive in an Francisco.

10 Q. Okay. I'm going to approach with Government
11 Exhibit 1503, which is a certified public record.

12 MS. PROVINZINO: And I'll move for admission of
13 that.

14 MR. GERDTS: What number?

15 MS. PROVINZINO: 1503.

16 BY MS. PROVINZINO:

17 Q. And do you recognize that, Iris?

18 A. What is this? I couldn't read it.

19 Q. And when I say recognize, there's a second line that
20 lists last name and first name. Is that your name?

21 A. My name, yes.

22 Q. And I don't think I've ever shown you this.

23 MS. PROVINZINO: Government moves admission of
24 1503.

25 MR. SICOLI: No objection.

1 MS. PROVINZINO: It's a certified public document.

2 MR. GERDTS: Your Honor, might we approach?

3 THE COURT: All right.

4 (Side bar at 1:54 p.m.)

5 MR. GERDTS: Your Honor, I'm looking at the
6 document right now. To me it -- Counsel is suggesting it's
7 just a record from the state department regarding an entry.
8 It looks to me like it's a police record, but I'll look at
9 it a little more, maybe my objection's not founded.

10 Merely because it's a certified, whatever, it
11 doesn't mean that it will come in because the police records
12 by definition are hearsay and are not admissible.

13 But may I have a look at it, please? Because I
14 thought it was -- I thought it was something different than
15 Counsel's saying it is.

16 MS. PROVINZINO: And that's fair. I'll allow Mr.
17 Gerdts to look at it.

18 It's a certified public record from Customs and
19 Border Protection. It's the record they make when somebody
20 enters the United States. So it lists name, date of birth,
21 date of entry, and location of entry, because they are all
22 produced pursuant to our certification from Customs and
23 Border Protection. It's not a police report.

24 MR. GERDTS: Let me look at it again. I may
25 withdraw my objection.

1 (In open court at 1:55 p.m.)

2 MS. PROVINZINO: I'll just give Defense Counsel
3 again a moment to look at that.

4 THE COURT: All right.

5 MR. GERDTS: Thank you, Your Honor. I'll withdraw
6 my objection.

7 THE COURT: And that was 1503?

8 MS. PROVINZINO: 1503. Thank you, Your Honor.

9 THE COURT: Is received.

10 MS. PROVINZINO: I'll put that on the screen.

11 BY MS. PROVINZINO:

12 Q. And Iris, I was referring to the last name and first
13 name, that's you, is that right?

14 A. That's correct.

15 Q. And that's your true date of birth?

16 A. Yes.

17 Q. And that's the date you entered the United States, is
18 that right?

19 A. Yes.

20 Q. June 16, 2009?

21 A. Correct.

22 Q. And you traveled from Tokyo to the San Francisco
23 International Airport, is that right?

24 A. Correct.

25 MS. PROVINZINO: And I made on error, Your Honor.

1 My colleague informed me that I failed to move admission of
2 Government Exhibit 1011, which is a photograph the witness
3 just identified of Teow, T-E-O-W. And I'll move for the
4 admission to Government Exhibit 1011?

5 THE COURT: I was going to ask if that had been
6 offered.

7 MR. SICOLI: No objection, Your Honor.

8 MR. GERDTS: No objection.

9 THE COURT: And 1011 is received.

10 MS. PROVINZINO: All right. And that was the
11 picture. Now it's in the record.

12 BY MS. PROVINZINO:

13 Q. All right. So you land in San Francisco?

14 A. Yes.

15 Q. At that point then what's the next step for you in terms
16 of doing sex work in the United States?

17 A. When I arrive in San Francisco in the morning. In
18 the evening I met with a person named M.

19 Q. Okay. And who is M?

20 A. She was woman who I had to pay the debt to for
21 \$60,000.

22 Q. And do you call M by any other names?

23 A. No.

24 Q. And so you had earlier identified that Tu had a
25 relationship -- or he was a significant other to M, is that

1 right?

2 A. Yes.

3 Q. So it wasn't until you came to the United States that
4 you understood your debt would be to M, is that right?

5 A. Yes.

6 Q. So what did M tell you when you got to the United States
7 about the debt?

8 A. M told me work as how you would be doing with your
9 boyfriend and that you would be spending four to six
10 months to pay off your debt.

11 Q. Okay. And how much did she tell you the debt would be
12 when you got to the United States?

13 A. \$60,000.

14 Q. Okay. And she told you that it would be four to six
15 months, is that right?

16 A. Yes.

17 Q. Did she explain anything about house fees?

18 A. She -- she did when I got here.

19 Q. And what did she tell you?

20 A. She said that when I would go to work at different
21 places, the house fee wouldn't be the same, it range from
22 60 to 80.

23 Q. So the house fee of 60 to 80, depending on which house
24 you were at. Did you understand that you had to pay for
25 that?

1 A. I did not know.

2 Q. And while you were under the debt of the 60,000 to M,
3 could you decide where you would go?

4 A. No, I could not.

5 Q. Could you decide what houses you would go?

6 A. No, I could not.

7 Q. What customers you would see?

8 A. I don't understand the question. Can you ask again?

9 Q. Yes. Thank you, Iris. Could you decide what customers
10 you would see?

11 A. No, I -- I can't. I couldn't.

12 Q. Could you decide what sex acts to do?

13 A. Yes, I could.

14 Q. And did M have any rules about the sex acts?

15 A. Yes, she did. So working for one hour -- for -- for
16 \$270.

17 Q. Okay. So one hour was \$270, right?

18 A. Oh, no. It was \$170.

19 Q. Okay. Thank you. So one hour was \$170.

20 A. Yes.

21 Q. And what would a customer get for one hour?

22 A. The main thing is to have sex. Yes. Having massage
23 and taking shower.

24 Q. Okay. You said three things there, shower, massage and
25 sex. Were those required services?

1 A. Yes.

2 Q. And I think you said were there some other services that
3 you could choose to do?

4 A. Yes.

5 Q. And what would those be?

6 A. If I wanted additional money, I would have to do a
7 blow job without condoms.

8 MS. PROVINZINO: May I approach with Government
9 Exhibit 302?

10 THE COURT: You may.

11 MR. RIVERS: Which Exhibit Number is that?

12 MS. PROVINZINO: 302 and Government Exhibit 303 at
13 the same time.

14 BY MS. PROVINZINO:

15 Q. So Iris, let's start Government Exhibit 302 first.

16 All right. And I'll call your attention to
17 Page 2, the attachment on the e-mail. And do you recognize
18 Page 2 of that exhibit?

19 A. Yes, I do.

20 Q. And was that?

21 A. It's my passport.

22 Q. And then on the first page?

23 A. Yes.

24 Q. This is a reference to an e-mail sent by
25 catcat_Thai@live.com?

1 A. Yes.

2 Q. And who is that?

3 A. It's M.

4 Q. And do you see the subject line on that e-mail?

5 A. I do.

6 Q. It says Lilyid?

7 A. Yes.

8 Q. And who was that?

9 A. It's me.

10 Q. And about halfway through the page, there's one
11 translation. And do you see some Thai characters in a blue
12 box? What is that word?

13 A. Orman.

14 Q. And do you know who that is?

15 A. I don't know.

16 MS. PROVINZINO: The Government moves the
17 admission of Exhibit 302?

18 MR. GERDTS: Well, Your Honor there's a -- object
19 on relevance and foundation for the communication. There's
20 a -- we don't have any foundation for the recipient of this.

21 THE COURT: Counsel?

22 MS. PROVINZINO: There is foundation established
23 in that it's the Defendant's passport. She identified that
24 on Page 2.

25 She also identified that the sender of the e-mail

1 is catcat_Thai or M, who held her bondage debt. And the
2 time -- and the subject for this is Lilyid.

3 There also is a further subject line of Chaba,
4 which the witness already said was her name.

5 So I believe there's both adequate foundation for
6 it and certainly relevance to the scheme of this underlying
7 conspiracy.

8 MR. GERDTS: Object to Page 2, Your Honor. The
9 the communication is on Page 1.

10 THE COURT: What the Court will do is
11 provisionally receive it. And after I've heard -- at least
12 with reference to Page 1 of the two. And then I'll make any
13 final ruling after the -- any direct and cross-examination
14 by respective Counsel.

15 So note the objection. But received with that
16 understanding.

17 BY MS. PROVINZINO:

18 Q. All right. Iris, let's focus on Page 2, first. Bless
19 you. And then we'll come back to Page 1.

20 I'm going to make the image on this page slightly
21 larger for the jury to see.

22 A. Yes.

23 Q. And was is that in this -- what is in the attachment of
24 this e-mail?

25 A. It is my passport picture.

1 Q. That's your passport picture?

2 A. Yes.

3 Q. And focusing on the first page of Government
4 Exhibit 203.

5 MR. GERDTS: Your Honor, I misunderstood the
6 Court's ruling. Was the first page admitted or not?

7 THE COURT: Provisionally received until I've seen
8 both the direct and the cross, yes.

9 BY MS. PROVINZINO:

10 Q. And there's a from e-mail, catcat_TY@live.com. Is that
11 correct?

12 A. Yes.

13 Q. And whose e-mail is that?

14 A. It's M's.

15 Q. There's another e-mail listed joyzone88@yahoo.com. Do
16 you know whose e-mail that is?

17 A. I don't know.

18 Q. Did you have another name for M, Iris?

19 A. I heard customer called her Joy, but I called her M.

20 Q. Okay. So you often heard M sometimes referred to as
21 Joy, is that right?

22 A. Yes.

23 Q. And the subject there is Lilyid, do you see that?

24 A. I do.

25 Q. And there's a series of some other e-mails, subject

1 Chaba. Who's that?

2 A. It's me.

3 Q. And, again, it's from sexynancy. Do you know who that
4 is?

5 A. I don't know.

6 Q. To M, right? Catcat_ty?

7 A. Yes.

8 Q. All right. And here we've got this mmka_za or Orman. Do
9 you know who that is?

10 A. I don't know.

11 Q. It referenced a passport, do you see that?

12 A. Yes.

13 Q. And this was originally sent July 6, 2009, right?

14 A. Yes.

15 Q. And remind the jury of your entry date into the United
16 States?

17 A. I arrived to the United States on the date of 16th
18 January, 2009.

19 Q. And I think it was about June, Iris -- and then we'll go
20 back to --

21 THE INTERPRETER: I would like to correct that.
22 Actually she said June.

23 MS. PROVINZINO: That's right? Okay. Perfect.

24 BY MS. PROVINZINO:

25 Q. Fair to say, Iris, you don't know everybody who's a part

1 of the conspiracy?

2 MR. GERDTS: Your Honor, I object. She can't know
3 what she does not know, so.

4 THE COURT: I'll sustain as to the form of the
5 question.

6 BY MS. PROVINZINO:

7 Q. And Iris, have you been on e-mail strings where you
8 haven't known everybody who's in the chain?

9 A. Yes.

10 Q. And let me jump ahead of this, because we're going to
11 talk about this with the jury, but you took different steps
12 within the organization, is that right?

13 A. Yes.

14 Q. And in that role did you have occasion to receive sexy
15 pictures and passports in an e-mail chain?

16 A. Yes.

17 Q. Is that something the organization would do?

18 A. Yes.

19 Q. And you might not necessarily know every single
20 individual or their e-mail in the chain, is that true?

21 A. Yes.

22 MS. PROVINZINO: The Government moves the
23 admission of Exhibit 302.

24 THE COURT: That's already --

25 MS. PROVINZINO: Admitted provisionally.

1 THE COURT: Well 2, Page 2 is received. And 1 was
2 provisionally received until I've heard all the direct and
3 cross.

4 MS. PROVINZINO: Thank you, Your Honor.

5 THE COURT: All right.

6 BY MS. PROVINZINO:

7 Q. And Iris, do you see Exhibit 303 in front of you?

8 A. I do.

9 Q. And there are a series of photographs that are
10 attachments to that e-mail. Do you see those?

11 A. I do.

12 Q. And who's in those photographs?

13 A. It's me.

14 Q. And where were those photographs taken?

15 A. In Thailand.

16 Q. And focusing on that first page of the exhibit.

17 A. Yes.

18 Q. There's a Thai word that's been translated. Can you
19 read that word?

20 A. I couldn't see.

21 Q. Okay. And maybe -- Government Exhibit 303.

22 A. "Sister, these are pictures."

23 Q. And did you read that right, Iris?

24 A. Yes.

25 Q. And it's referring to Lily?

1 A. Yes.

2 Q. And that's you, right?

3 A. Yes.

4 MS. PROVINZINO: The Government moves the
5 admission of Exhibit 303.

6 MR. GERDTS: No objection, Your Honor.

7 MR. GUERRERO: No objection.

8 MR. SICOLI: No objection.

9 THE COURT: Those are received.

10 BY MS. PROVINZINO:

11 Q. All right. Briefly so the jury can see. That's M's
12 e-mail, the catcat, right?

13 A. Yes.

14 Q. And these were sent in July of 2010?

15 A. Yes.

16 Q. And "Sister, these are pictures." Lily and attachments
17 that say Chaba?

18 A. Yes.

19 Q. And Chaba's you, is that right?

20 A. Yes.

21 Q. And they had originally been information forwarded to M
22 in April of 2010, is that -- do you see that?

23 A. Yes.

24 Q. And the jury had get a chance to look at these, but just
25 to show them one, is that one of the pictures taken at

1 Toilet Studio?

2 A. Yes.

3 Q. So these are the ones you took with Teow?

4 A. Yes.

5 Q. So you met with M soon after arriving in San Francisco,
6 is that right?

7 A. Yes.

8 Q. And she explained a little bit more about the debt and
9 the work itself?

10 A. Yes.

11 Q. And then did you start working or selling sex for M?

12 A. Yes.

13 Q. And where did that occur?

14 A. It happened first in San Francisco.

15 Q. And where in San Francisco?

16 A. It was an Asian house, but the customer was
17 foreigners.

18 Q. Okay. And how was your experience there, Iris?

19 A. I couldn't work at all, because I had never done this
20 before. So the house owner send me back to M within one
21 week.

22 Q. And so what happened once you were sent back to M?

23 A. M had me to travel to Chicago.

24 Q. So where in Chicago did you go?

25 A. In the area of O'Hare.

1 Q. And what type of place were you working out of?

2 A. It was a hotel.

3 Q. Was anyone else there?

4 A. I don't know.

5 Q. Or -- so were you with M at the time?

6 A. Yes.

7 Q. Was anyone else with you?

8 A. At the time, no.

9 Q. Okay. And so what did M instruct you to do?

10 A. She told me to work. So -- to work so that I give
11 the good service to the customer and I could pay off my
12 debt quickly.

13 Q. Okay. And so what did you do when you were with M near
14 O'Hare?

15 A. I sell sex.

16 Q. And so what happened with the money?

17 A. The money that I made from work I gave it to M.

18 Q. Would that be to pay off the debt?

19 A. Yes.

20 Q. And were any of those house fees?

21 A. There was.

22 Q. And how much was the house fee?

23 A. 70.

24 Q. And while you were working in Chicago, how would you
25 communicate with M?

1 A. By phone.

2 Q. And how frequently would you communicate with her?

3 A. Every day.

4 Q. And how would you get customers?

5 A. M would be the one who send me customers.

6 Q. Okay. And did something happen where you were unable to
7 communicate with M for a period of time?

8 A. Yes, there was.

9 Q. And tell the jury what happened?

10 A. After I had been to Chicago for two, three weeks, M
11 was arrested by the police.

12 Q. How did you find out?

13 A. After M did not contact me for half a day. The next
14 day in the morning she contacted me and said that she was
15 arrested.

16 Q. Was anyone else arrested with her?

17 A. Yes, there were.

18 Q. And who was arrested with M?

19 A. The name were Pu and Anna -- I'm sorry. I'm sorry, I
20 said the name wrong.

21 Q. That's okay. What were the names with people with M?

22 A. The name the name was Faa and Pu.

23 Q. So Faa and Pu were arrested with M. And who were Faa
24 and Pu?

25 A. So Pu was sister to M. And Faa, I'm not sure if she

1 was in debt to M because she had come before me. But
2 both of them were working for M.

3 Q. And when you say working for M, does that mean they had
4 debt to M?

5 MR. RIVERS: Objection, leading.

6 THE COURT: Sustained as to the form of the
7 question.

8 I'll allow the inquiry if you want to put a new
9 question in front of the witness.

10 BY MS. PROVINZINO:

11 Q. And you say they were working for M. Iris, what does
12 that mean?

13 A. M would be the person who send them customers.

14 Q. And that was like your arrangements with M?

15 A. Yes.

16 Q. Did Pu and Faa owe debt to anyone?

17 A. I don't know.

18 Q. And they came to the United States before you, is that
19 right?

20 A. Yes.

21 Q. So you learned about the arrest. And then what happens
22 next in your communication with M?

23 A. After M and I met in for the next day, we were
24 staying together 10 days in Chicago.

25 Q. And during that stay, the 10 days in Chicago, were you

1 doing sex work for M?

2 A. No. There was not.

3 Q. Not after the arrest, is that right?

4 A. No.

5 Q. Had M been involved in sex work?

6 A. This I don't know.

7 Q. And during the time you were in Chicago with M, who had
8 your passport?

9 A. M did.

10 Q. How long did she have it?

11 A. About two weeks.

12 Q. Why did she have it?

13 A. She said that -- let her keep it because she was
14 afraid the customer would steal it.

15 Q. Was that the real reason?

16 A. It's not.

17 Q. What was the real reason she had your passport?

18 A. I had learned it later on, I think that she was
19 afraid that I would run away.

20 Q. Did you get your passport back?

21 A. I did.

22 Q. And how did you get it back?

23 A. After she got arrested she returned it to me.

24 Q. All right. Iris, do you know anyone else in the
25 criminal organization that holds onto passports?

1 A. I only heard something in Sherburne that people are
2 talking.

3 Q. And what are they saying about people holding passports?

4 MR. GUERRERO: Objection.

5 MR. GERDTS: Objection.

6 MR. ENGH: Objection.

7 THE COURT: Sustained.

8 BY MS. PROVINZINO:

9 Q. So other than that you don't know?

10 A. No, I don't -- I don't know.

11 Q. But yours -- how long had M held onto your passport?

12 A. Two weeks.

13 Q. Now you said the reason M held onto your passport is she
14 was afraid you would run away, is that true?

15 A. Yes.

16 Q. At some point did you want to leave?

17 A. I had the thought of going back to Thailand after I
18 had been here for three to four months.

19 Q. And was it more than just a thought?

20 A. I was really had intention to do back.

21 Q. And did you take any steps to do that?

22 A. I had talked to M. I had asked her -- I wanted to go
23 back to Thailand.

24 Q. How did she respond?

25 A. She said to me, if I hadn't paid off my debt and

1 didn't come back to pay off my debt, she wouldn't
2 guarantee the safety of my family.

3 Q. What did you do after hearing that?

4 A. I was concerned about my family in Thailand. So I
5 had decided to -- to stay.

6 Q. So at that point you said you were here for about four
7 months, is that right?

8 A. Yes.

9 Q. And how long did it take you to pay off your debt?

10 A. 15 months.

11 Q. Iris, do you know of any others who tried to run away or
12 escape from M?

13 A. I have heard.

14 Q. What do you know?

15 MR. ENGH: Objection. Eliciting hearsay.

16 THE COURT: Yes. I would like to know the source
17 of the information and the timing of it. I'll allow the
18 inquiry. But until I know that, I'll sustain the objection.

19 BY MS. PROVINZINO:

20 Q. How do you know this information, Iris?

21 A. There was a woman who I used to work together called
22 and asked me.

23 Q. A working woman that you worked with?

24 A. Yes.

25 Q. And she told you this directly?

1 A. Yes.

2 Q. And was this the woman who had tried to escape or run
3 away from M?

4 MR. ENGH: Objection. It's leading and again
5 hearsay.

6 THE COURT: Sustained as to the form.

7 And then, Members of the Jury, I'll let her answer
8 stand, if she has an answer, not for the truth of the matter
9 asserted, but why she believes -- or what her source of
10 information is. Not for whether it's true or false, you'll
11 decide that. But why she is of this view.

12 But note the objection, also.

13 BY MS. PROVINZINO:

14 Q. And Iris, I may not be asking these questions well, who
15 is this woman?

16 A. Which woman that you said?

17 The woman that had attempted to run away or escape from M?

18 A. Her name was Pu.

19 Q. And did she tell you about her circumstances?

20 A. No. No, it wasn't.

21 Q. Who did you learn it from?

22 A. The person who knew Pu couldn't -- couldn't get in
23 touch with Pu, so she called me and asked me if I had
24 seen Pu.

25 Q. And at that point in time, had you been in contact with

1 Pu?

2 A. No, there was not.

3 Q. Were you able to contact Pu?

4 A. No, I could not.

5 Q. Was Pu gone?

6 A. She was disappearing for a week.

7 Q. So she was gone for a week?

8 A. Yes.

9 Q. And at some point she returned?

10 A. Yes.

11 Q. Now we've talked a lot about M.

12 A. Yes.

13 Q. And she's the one you owed your debt to, right?

14 A. Yes.

15 Q. And you were with her for that extended period of time
16 in Chicago 2009, is that right?

17 MR. ENGH: Objection. Asked and answered about
18 five times.

19 THE COURT: Well, the -- if this is a transitional
20 question to the next question, I'll permit it.

21 BY MS. PROVINZINO:

22 Q. Iris, when did you see M?

23 A. I saw her the first day when I came to America the
24 first day.

25 Q. Okay. And that was in San Francisco?

1 A. Yes.

2 Q. And we talked about the time in Chicago?

3 A. Yes.

4 Q. Were there any others?

5 A. There was.

6 Q. And when was that?

7 A. After M was arrested, she traveled to Houston.

8 We met in Houston. And later on she followed to
9 California.

10 Q. Okay. And what timeframe was this?

11 A. During the time that I had been in America for three
12 months.

13 Q. Okay. So this -- at this point in time, you were still
14 under debt, is that right?

15 A. Yes.

16 Q. So during that time, you were under debt, what houses
17 did you work at?

18 A. As far as I remember, I worked for M's house in
19 Chicago, in San Francisco, in Washington D.C., and in
20 Atlanta, Orange County, and Sacramento.

21 Q. And at those locations, who sent you to them?

22 A. M did.

23 Q. And I'm showing you what's been already admitted as
24 Government Exhibit 320. And at the top this appears to be a
25 Southwest Airlines ticket --

1 A. Yes.

2 Q. -- for December 30, 2009. So you're still under debt,
3 right?

4 A. Yes.

5 Q. And the ticketless confirmation has your name?

6 A. Yes.

7 Q. And you see this gangsmoo@hotmail.com?

8 A. Yes.

9 Q. Did you know who that is?

10 A. I do.

11 Q. And who is that?

12 A. Moo.

13 Q. And who is Moo?

14 A. This is the person who booked me the ticket.

15 Q. And it appears to be a ticket for you from
16 Minneapolis/St. Paul through Chicago onto Washington Dulles.
17 Do you see that?

18 A. Yes.

19 Q. And that was one of the houses you worked at while under
20 debt?

21 A. Yes.

22 Q. And describe Moo to the jury?

23 A. Moo has short hair. She's a little bit chubby. Like
24 a tomboy. She's like a tomboy. Friendly.

25 Q. So I'm showing you Government Exhibit 1065, which has

1 already been admitted. Who's that?

2 A. It's Moo.

3 Q. And what role did M play in the organization -- or Moo,
4 I'm sorry. Moo play?

5 A. So she would be the person who booked the tickets for
6 people to go to different states.

7 Also she would booked the hotel and also pick
8 up -- pick up people at the airport and sent money for M.

9 Q. And did you work with Moo on those different things, the
10 tickets, the hotels and moving money for M?

11 A. Yes.

12 Q. So during that time you were in debt, you mentioned a
13 string of different cities you worked at, including Orange
14 County?

15 A. Yes.

16 Q. And who sent you to Orange County?

17 A. M did.

18 Q. And what house did she send you to work at?

19 A. At Maya's house.

20 Q. And did you know Maya?

21 A. I don't know.

22 Q. Do you know someone named Bill, Iris?

23 A. Yes, I do.

24 Q. And who was that?

25 A. He is a white guy.

1 Q. And what role did he play?

2 A. So when I went to work at Maya's house in the early
3 of 2010. I had met a person named Bill. He came to
4 greet me and made me steak.

5 Q. Okay. And so that was early 2010?

6 A. Yes.

7 Q. And you were under debt to M at the time?

8 A. Yes.

9 Q. And do you see this person you identified -- or as
10 you're describing as Bill here in the courtroom?

11 A. I do.

12 Q. And can you point to him or identify what he's wearing?

13 A. Uncle Bill is wearing a black T-shirt, shirt. He's a
14 white guy. Has no hair.

15 MS. PROVINZINO: Let the record reflect that the
16 witness has identified Michael Morris, who she references as
17 Uncle Bill in the courtroom.

18 THE COURT: So reflected.

19 BY MS. PROVINZINO:

20 Q. And was Bill a member of the criminal organization?

21 MR. RIVERS: Objection. Vague.

22 THE COURT: If she understand the question, I'll
23 -- I'll allow her to answer. The objection goes to the
24 weight, depending upon her basis for her answer, if she
25 understands it.

1 BY MS. PROVINZINO:

2 Q. Was Bill a member of the criminal organization?

3 THE COURT: Note the objection. You may answer.

4 A. Yes, he is.

5 BY MS. PROVINZINO:

6 Q. What did he do for the organization?

7 A. He opened a house, a working house.

8 Q. And where did he open a working house?

9 A. Orange County.

10 Q. Did he work with anyone else?

11 A. I don't know.

12 Q. And at the house in Orange County, who sent you there?

13 A. M did.

14 Q. And how long were you there?

15 A. Two weeks.

16 Q. What do you remember about that time and this -- was it
17 working with Bill and Maya?

18 A. I -- for one hour, the price was 180. And the house
19 fee was 80. Yes.

20 Q. And what were the services required for one hour?

21 A. If the customer comes, I have to take a shower with
22 the customer, have sex with them, massage them and do my
23 best work.

24 Q. And when you went to Orange County, who picked you up in
25 Orange County?

1 A. There was nobody did.

2 Q. Okay. Who would come and collect money?

3 A. Maya did.

4 Q. And did Maya or Bill give you any instructions on how
5 you could pay off the debt faster?

6 MR. SICOLI: Objection, Your Honor. She said she
7 only went to Maya's house, not Bill's house. And she's
8 trying to conflate the jury.

9 THE COURT: I'll let the jury decide as to which
10 house she testified to. Why don't we rephrase the question,
11 break it down.

12 BY MS. PROVINZINO:

13 Q. Did you get any instruction on what you could do to pay
14 off the debt faster?

15 A. Yes. There was.

16 Q. And what was the instruction?

17 A. To keep good service to customer, and to do
18 everything to make the customer happy.

19 Q. And was there any information for -- when you were
20 working at Orange County on a website?

21 A. I'm thought sure if there was any review. I didn't
22 know anything.

23 Q. Was there any information about the services that would
24 occur at the house in Orange County?

25 A. No. There's none.

1 Q. So you're told to do good service, which you've
2 identified, as shower, sex, massage, and doing your best, is
3 that right?

4 A. Yes.

5 Q. Were there any acts you -- sex acts that you had to
6 perform, or were required to perform?

7 A. So I only work as something basic. I couldn't do
8 anything special at all.

9 Q. And when you were in Orange County, is it fair that you
10 spoke with Maya more because you would speak in Thai with
11 her?

12 A. Yes.

13 Q. And did she tell you anything about what kind of oral
14 sex you had to perform?

15 A. Yes, she did.

16 Q. And what was the rule on that?

17 A. There was really no rule, but she said if I wanted to
18 make extra money, I should be able to do a blow job
19 without condoms.

20 Q. And at that point in time, so early in 2010, how well
21 could you speak English?

22 A. I couldn't speak English at all.

23 Q. While you were working in Orange County could you set
24 your schedule?

25 A. No, I could not.

1 Q. Could you choose your customers?

2 A. No, I could not.

3 Q. Could you have left?

4 A. No, I could not.

5 Q. So you were talking a little bit about Uncle Bill.

6 Tell the jury what you remember of Uncle Bill
7 during your time in Orange County?

8 A. As far as I remember, I don't remember how many days
9 I had worked at Maya's house. But there was one day
10 where Uncle Bill came over and introduced himself and
11 that he made me a steak for dinner.

12 The next morning he also took me to buy makeup
13 and -- in his sport car, an open roof. I don't remember
14 what color it was. But I remember he was really kind.

15 Q. And what was the interaction you observed between Bill
16 and Maya?

17 A. They were friends.

18 Q. Did they work together?

19 A. At that time I think so.

20 Q. And now you've worked very closely with M from the time
21 you came into the country until you were arrested, is that
22 true?

23 A. Yes.

24 Q. And what was M's relationship with Uncle Bill?

25 A. There was no relationship.

1 Q. What would M do with the girls under her tax in relation
2 to Bill?

3 A. I don't know.

4 Q. And I guess I'm asking the question in a bad way. Was
5 Uncle Bill's house one that M would frequently send girls
6 under debt?

7 MR. SICOLI: Your Honor, this has been now
8 answered three times.

9 THE COURT: I'll let the jury decide if this is
10 the second, or third, or fourth time or whatever.

11 But if she understands the question, Uncle Bill's
12 house and the question, note the objection. I'll let her
13 answer.

14 MR. RIVERS: Your Honor, I think it's also
15 leading.

16 BY MS. PROVINZINO:

17 Q. I think there's confusion. There's no familial or other
18 between M and Uncle Bill. So I'm asking about any kind of
19 business relationship?

20 A. Yes.

21 Q. And what was that?

22 A. Sometimes -- sometime M would send the girls to work
23 at Uncle Bill's.

24 THE COURT: If we can find it -- it doesn't have
25 to be this moment, but a logical place to take our afternoon

1 recess.

2 MS. PROVINZINO: I was just looking at my outline,
3 so I'm happy to take a break at this moment, Your Honor.

4 THE COURT: All right. Folks, we'll take an -- at
5 least a 15-minute recess here. So let's rise for the jury,
6 please.

7 (Jurors excused at 2:46 p.m.)

8 THE COURT: So we'll see everybody in about 15.

9 (In open court at 3:05 p.m.)

10 THE COURT: As soon as the jury is ready, you may
11 continue, Counsel.

12 MS. PROVINZINO: Thank you, Your Honor.

13 BY MS. PROVINZINO:

14 Q. Iris, at the end of your 15 days working in Orange
15 County, who took you to the airport?

16 A. I took taxi.

17 Q. And then you had -- you continued to work under M while
18 you were in debt, is that right?

19 A. Yes.

20 Q. And that was for another half a year until the 15 months
21 were up?

22 A. Yes.

23 MS. PROVINZINO: May I approach with Government
24 Exhibit 241?

25 THE COURT: You may.

1 BY MS. PROVINZINO:

2 Q. Iris, I'm handing you an exhibit, that's an e-mail
3 between catcat_ty and Asia Club Now relating to Pu's pics.
4 And I'm just wondering if that was the same Pu you would
5 been spoken earlier about?

6 A. This is not Pu.

7 Q. That is not the Pu that had run from M?

8 A. No, she's not.

9 Q. Do you know that Pu?

10 A. This person named Pu.

11 Q. And was Pu one of M's girls?

12 A. Yes.

13 Q. And it appears that in that chain, it's from catcat to
14 an e-mail future-3333. Do you know who that is?

15 A. I don't know.

16 Q. So catcat we've established is M, is that right?

17 A. Yes.

18 Q. Do you know who Asia Club Now is?

19 A. I don't know.

20 Q. But those are the images of Pu? That was one of M's
21 girls?

22 A. Yes.

23 MS. PROVINZINO: The Government moves the
24 admission of Exhibit 241.

25 MR. GERDTS: Can I see it Ms. --

1 MS. PROVINZINO: I have a copy of it with the
2 witness.

3 MR. GERDTS: Well, Your Honor, I would object on
4 foundation grounds to the communication and relevance to
5 this case.

6 THE COURT: Any other Defense Counsel want to be
7 heard before I hear from Government Counsel?

8 MR. SICOLI: No.

9 MS. PROVINZINO: There will be additional
10 foundation laid.

11 The witness has identified that Pu is one of M's
12 girls and under debt to M that was sent. And there will be
13 testimony from additional witnesses that Asia Club Now is an
14 e-mail that Michael Morris, or Bill had.

15 THE COURT: The primary -- as a primary purpose at
16 this stage, limited for the limited purposes showing the
17 identity of the person?

18 MS. PROVINZINO: The identity of the person is
19 somebody under debt to M.

20 THE COURT: So what I'm saying is, for the purpose
21 of the photograph, I will provisionally permit it without
22 reference to the e-mail addresses.

23 MS. PROVINZINO: Thank you, Your Honor.

24 And I believe that our witness from the other day,
25 Noppawan Lersluchachai, known as Moo, had identified the

1 Asia Club Now as an e-mail handle belonging to Michael
2 Morris or Bill.

3 But for limited purposes, we'll show Government
4 Exhibit 241 to the jury.

5 THE COURT: And that's -- and then without
6 referencing anything but the photograph, is that correct?

7 MS. PROVINZINO: At this point, yes, Your Honor.

8 THE COURT: All right. And then I'll receive it
9 provisionally with that understanding. And then I'll hear
10 from anyone if it's admitted for any other purpose other
11 than the paragraph itself, separate from the e-mail issue.

12 So with that understanding we'll continue.

13 BY MS. PROVINZINO:

14 Q. And Iris, just to clarify, there was a different person
15 named Pu that had run away from M, is that right?

16 A. Yes.

17 Q. But that's not the Pu in this photograph, is that right?

18 A. No. This person her name was Pu?

19 Q. And who was this Pu?

20 A. She's M's girl.

21 Q. And speaking of M, we haven't had an opportunity to
22 identify her for the jury yet.

23 A. Yes.

24 Q. I'm handing you Exhibit 1012. Take a look at these
25 photographs.

1 Do you identify the people in those photographs?

2 A. Yes, I do.

3 Q. And who is it?

4 A. M is wearing a black t-shirt, short. And M is
5 wearing a long-sleeved red shirt. Opal is wearing a
6 long-sleeved shirt. Many colors.

7 MS. PROVINZINO: The Government moves the
8 admission of Exhibit 1012.

9 MR. GUERRERO: No objection.

10 MR. GERDTS: No objection.

11 THE COURT: Received.

12 BY MS. PROVINZINO:

13 Q. All right. Lily, let's make this visible to the jury.
14 And you are identifying the people in this photo. And you
15 can actually touch the screen.

16 All right. And you're in the middle, is that
17 right?

18 A. Yes.

19 Q. All right. And who is M?

20 A. She's wearing a black T-shirt with short hair.

21 Q. All right. And do you want to touch the screen and
22 identify where she is in the picture?

23 A. That's M.

24 Q. And I'll have you touch the screen so the jury can
25 actually see where you're at. Oh, you got it. I can't see

1 it on my screen in front of me. There it is.

2 Okay. And then who's the other individual on your
3 other side?

4 A. She's Opal.

5 Q. Okay. And who is Opal?

6 A. She's M's friend.

7 Q. Okay. And how did they get to know each other?

8 A. She used to tell me that they had known each other
9 from England.

10 Q. And where was this photograph taken?

11 A. At a hotel Comfort Inn in Bloomington at the
12 restaurant Outback.

13 Q. And why did you take that photograph?

14 A. After three months that I had been in America, I
15 never saw her again until she came here to visit. And so
16 I took the picture for memento.

17 Q. But there was a period of time you hadn't seen M?

18 A. Yes.

19 Q. Like 2009, is that right? And when -- when did you take
20 this photo?

21 A. I'm not sure. It's probably from 2012 to early 2013.

22 Q. And if M wasn't here in Minnesota, where was she?

23 A. I was not sure where she really was. She told me
24 sometimes in Canada, sometimes in England, sometimes in
25 California, sometimes in Thailand. So I'm not sure where

1 she was.

2 Q. And during that time when she wasn't in Minnesota, how
3 would you communicate with her?

4 A. By phone.

5 Q. Now after you had paid off the debt, you still continued
6 to work in commercial sex, is that right?

7 A. Yes.

8 Q. Why did you continue to do that?

9 A. I was still having to take care of my mother. And
10 also taking -- sending her money to see the doctor. And
11 I also had to help the family with their debt.

12 Q. And during this time when you weren't under debt
13 anymore, did the work change for you?

14 A. Yes, it did.

15 Q. How did it change?

16 A. I was able to go to work anywhere I wanted, or I
17 could take days off when I wanted. And I need not to be
18 under anyone's control.

19 Q. So that wasn't the case when you were under debt to M,
20 is that right?

21 A. Yes.

22 Q. So at some point in time did you decide to continue to
23 help M?

24 A. Yes.

25 Q. And tell the jury about that?

1 A. I helped M by I -- I introduce the girls by going to
2 the back, and introduced them to how to buy food and how
3 to call taxi.

4 Q. All right. So how would you help with calling a taxi?

5 A. I would give them the phone number.

6 Q. And were there any individuals in M -- in Minnesota that
7 helped the organization as a taxi?

8 A. There were.

9 Q. Who were those people?

10 A. A customer named John.

11 Q. And Iris, I'm showing you what's already been admitted
12 as Government's Exhibit 1039. And was this the customer
13 John you were referring to?

14 A. Yes.

15 Q. So what did he do for the organization?

16 A. As far as I know, he had been old-time customer from
17 the beginning to the end. Later on he became a taxi for
18 M. Take the girls to buy food and to the bank. And
19 sending money at the bank.

20 Q. And you indicated you helped with food, as well. What
21 would you do in that role?

22 A. So we would go together to buy food during the time
23 that M let us take the time off and during that hour.

24 So I would tell them, Oh, this is where the Thai
25 food is, something like that.

1 Q. And would you go with the women under debt?

2 A. Yes. We went together because I had to buy food,
3 too.

4 Q. You also mentioned you helped M with banking.

5 A. Yes.

6 Q. And what did you do to help with banking?

7 A. I sent money to M.

8 Q. And what money would you send to M?

9 A. After I paid off my debt, I would send her the house
10 fee.

11 Q. What about the house fees from the other women working?

12 A. We would each send our own house fee individually.

13 Q. And what about those who were still under debt to M?

14 How would they get that money back to her?

15 A. The girls would send money to California to someone
16 named Moo. And then the money would be passed on to a
17 person named Arm.

18 Q. And you indicated that Arm and Moo, where were they
19 located?

20 A. You mean now?

21 Q. I'm sorry. Where were they located when they were
22 helping M get money back to her?

23 A. They were in California.

24 Q. Who would do scheduling when you were at M's houses?

25 A. M did.

1 Q. Who would do advertising?

2 A. I don't know.

3 Q. Where there occasions when you would help M get tickets
4 to women working?

5 A. I had never booked tickets to girls.

6 Q. But you didn't book, but would there times she'd send
7 you e-mails and ask you to help get tickets or other
8 information to the girls in the house?

9 A. Yes.

10 Q. And who would book to see tickets for M?

11 A. Moo did.

12 Q. Now I'm approaching with Government Exhibit 492. And
13 I'll have you take a look at the top of that exhibit.

14 And can you identify the e-mail on the to line,
15 the pet1138@gmail.com?

16 A. It is my own e-mail.

17 Q. So that's an e-mail that M sent to you?

18 A. Yes.

19 MS. PROVINZINO: The Government moves the
20 admission of Exhibit 492.

21 THE COURT: Any objections?

22 MR. GERDTS: Just a moment, Your Honor.

23 THE COURT: All right.

24 MR. GERDTS: No objection.

25 MR. SICOLI: No objection.

1 THE COURT: That's received.

2 BY MS. PROVINZINO:

3 Q. All right. Iris, we'll show that the jury. We'll make
4 that a little bit allegor.

5 So we've identified catcat as M's e-mail, is that
6 right?

7 A. Yes.

8 Q. All right. And you're pet1138@gmail.com?

9 A. Yes.

10 Q. And it looks like M is forwarding you an eticket
11 confirmation?

12 A. Yes.

13 Q. And there's a name listed here, Yadaporn Panngoen. Do
14 you know who that is?

15 A. No, I don't know.

16 Q. Now I'm approaching with Government Exhibit 306. And
17 this appears to be another e-mail to you at the pet1138. Do
18 you recognize that e-mail?

19 A. I do.

20 MS. PROVINZINO: The Government moves the
21 admission of Exhibit 306.

22 MR. GUERRERO: No objection.

23 MR. GERDTS: No objection.

24 MR. ENGH: No objection.

25 MR. RIVERS: No objection.

1 MR. SICOLI: No objection.

2 THE COURT: Received.

3 BY MS. PROVINZINO:

4 Q. All right. Iris, I'm putting Exhibit 306 on the screen.

5 So you're the pet1138 who is this Loren Cahlander?

6 A. This person was customer.

7 Q. And did he send you frequent communication?

8 A. Yes.

9 Q. And in one of those e-mails, he asks you, "Can you find
10 out from Joy when she is sending some more ladies to
11 Minnesota?"

12 A. Yes.

13 Q. And who is the Joy he's referring to here?

14 A. That referred to M.

15 Q. And what would you do when a customer asked about more
16 women coming to Minnesota?

17 A. Sometimes I would call M and asking her why there was
18 no more girl coming here to Minnesota. Sometimes M would
19 pick up the phone, sometimes she didn't.

20 Q. So were there periods of time when you weren't in
21 communication with M?

22 A. Yes.

23 Q. But was M calling those shots about who was being sent
24 to Minnesota?

25 A. Yes.

1 Q. And you said at times you would help M get the cash back
2 to her, is that right? From you or from the working women?

3 A. Yes.

4 Q. Now I'm showing you Government Exhibit 504, which is an
5 e-mail from M to you. I'll have you look at that and see if
6 you can identify it.

7 And would this be an example of a type of way you
8 would help M and moving money and banking?

9 A. Yes.

10 MS. PROVINZINO: The Government moves admission of
11 Exhibit 504.

12 MR. GERDTS: No objection Your Honor.

13 MR. SICOLI: No objection.

14 THE COURT: That's received.

15 MS. PROVINZINO: We'll quickly show that to the
16 jury.

17 BY MS. PROVINZINO:

18 Q. And, again, at the top, that's an e-mail from M to you
19 with -- there's some Thai words here, does that say account
20 number?

21 A. Yes.

22 Q. And then in the body of that, it appears to be a
23 forwarded e-mail from natty.cute22@gmail.com. Do you know
24 who that is, Iris.

25 A. I don't know.

1 Q. And then do you recognize these names here associated
2 with Wells Fargo Bank accounts?

3 A. I don't know.

4 Q. I'm going to approach with Government Exhibit 1038. See
5 if you can recognize that exhibit.

6 A. Yes.

7 Q. And what does that exhibit show?

8 A. The locations that M had sent women to sell sex.

9 MS. PROVINZINO: Government moves admission of
10 Exhibit 1038.

11 MR. GERDTS: Objection, Your Honor. It's not a
12 piece of evidence, it's a demonstrative chart made by
13 somebody, I don't know who.

14 MS. PROVINZINO: The witness is able to identify
15 all these locations as houses of prostitution that were run
16 by M, but locations that she also helped facilitate the
17 organization.

18 THE COURT: Anything further, Mr. Gerdts?

19 MR. GERDTS: Your Honor, it's just a demonstrative
20 chart.

21 THE COURT: What I'll do is for the purpose of
22 direct and cross-examination by all lawyers, depending on
23 the questions, I'll provisionally receive it.

24 And then I'll reserve the right to hear any
25 additional argument by Counsel. After I see the purpose of

1 which it's been used and how it's, if at all, assisted the
2 witness currently on the stand.

3 MS. PROVINZINO: Thank you, Your Honor. The
4 Government will publish for the jury, Exhibit 1038.

5 BY MS. PROVINZINO:

6 Q. Now Iris, how did M run her current business here in
7 Minnesota?

8 A. I don't understand the question.

9 Q. So let's focus on where -- where did M have her houses
10 for working people here in Minnesota?

11 A. Okay.

12 Q. And can you describe that to the jury?

13 A. Yes.

14 Q. So let's focus on -- let's start with the Comfort Inn?

15 A. Is this the hotel?

16 Q. And tell the jury about this particular hotel?

17 A. This is the first hotel that I stay when I arrived
18 and where I worked when I came to this state.

19 Q. And you were under debt at that time?

20 A. Yes.

21 Q. And it was M that sent you there?

22 A. Yes.

23 Q. Now is this the same location connected to the Outback
24 Steakhouse?

25 A. Yes.

1 Q. Let's focus on the next one, Iris. There is a La
2 Quinta?

3 A. Yes. This is another hotel that M had sent women to
4 work to sell sex.

5 Q. Is that one you worked out of?

6 A. I did.

7 Q. What about the Quality Inn?

8 A. I had gone to work there, as well.

9 Q. Did M send other people there?

10 A. Yes, she did.

11 Q. And the Park Plaza Hotel?

12 A. Yes.

13 Q. Did you work there?

14 A. I did.

15 Q. And are all of these locations close to the airport?

16 A. Yes.

17 Q. Do you know why M chose those locations to run her
18 business?

19 A. Because it's convenient to travel to the airport.

20 Q. And then at some point in time, M decided to move from
21 hotels into apartments, is that right?

22 THE COURT: Mr. Gerdts?

23 MR. GERDTS: Objection. Leading, Your Honor.

24 THE COURT: I'll sustain as to the form of the
25 question. I'll allow the inquiry. She'll put a new

1 question in front of you.

2 BY MS. PROVINZINO:

3 Q. In addition to the hotels, where else did M operate her
4 business in Minnesota?

5 A. There were two apartments.

6 Q. And can you tell the jury about those apartments.

7 I'll pull Genesee Apartments up, first.

8 A. How do I read it?

9 Q. Oh, describe -- so was this an apartment that M used?

10 A. Yes.

11 Q. And can you tell the jury about that?

12 A. This apartment is what M rented for working women.

13 Q. And do you know where that was located?

14 A. I do.

15 Q. And where -- where is that apartment?

16 A. It's in area of Bloomington.

17 Q. And what about the York Plaza Apartments?

18 A. This apartment was rented by M for working women, as
19 well.

20 Q. Where is that apartment located?

21 A. Is in Edina.

22 Q. Edina?

23 A. Something like that.

24 Q. And Iris, did you work out of this apartment?

25 A. Yes, I did.

1 Q. And were there other people that M sent to work out of
2 this apartment and the Genesee Apartments?

3 A. Yes, there were.

4 Q. So it sounds like you worked out of all of these places,
5 is that right?

6 A. There was one place that I didn't go.

7 Q. You didn't work out of Genesee, is that right?

8 A. That's correct.

9 Q. Did you help M supervise work out of all of those hotels
10 or apartments?

11 A. I did.

12 Q. Now after debt, was it common for members of the
13 organization to continue to work in commercial sex acts?

14 A. Yes.

15 Q. And that was one of the roles you played, is that right?

16 MR. ENGH: Excuse me. Again leading.

17 THE COURT: Sustained as to the form. I'll allow
18 the inquiry, but we'll put a new question.

19 BY MS. PROVINZINO:

20 Q. How would a person get to a, house to a house as part of
21 this organization?

22 A. They would fly.

23 Q. And who would organize it?

24 A. If you paid off your debt you could manage the ticket
25 yourself.

1 Q. And if you hadn't paid off your debt, who would organize
2 it?

3 A. M would be the person who paid for the ticket, but
4 Moo would be the one who booked the ticket.

5 Q. And so there would be a -- you would need to have a
6 ticket involved, is that right?

7 A. Yes.

8 Q. It would be -- would it be common for the organization
9 to send pictures?

10 A. Yes.

11 Q. And so if somebody was under debt, who would those
12 photographs come from?

13 A. It came from Moo.

14 Q. Okay. And if you weren't in debt anymore, who would
15 send the pictures?

16 A. After I paid off my debt, I was still using Moo for a
17 year. And then I got married, and I had my husband
18 helped me booking the tickets.

19 Q. So you got married. Tell the jury a little bit about
20 how you met your husband?

21 A. When I was still -- when I was still paying my debt,
22 M had sent me to work at Atlanta, Georgia where I had met
23 my husband, who was also my customer.

24 After we were going out for one year, we fell in
25 love and we decided we would get married.

1 BY MS. PROVINZINO:

2 Q. Now I'm approaching with Government Exhibit 1024.

3 And Iris, do you recognize the person in that
4 photograph?

5 A. Yes, I do.

6 Q. And who is that?

7 A. My husband.

8 MS. PROVINZINO: The Government moves the
9 admission of Exhibit 1024?

10 MR. RIVERS: Can I see 1024? It's in --

11 MS. PROVINZINO: No objection. The Government
12 moves admission of 1024.

13 THE COURT: It's received.

14 BY MS. PROVINZINO:

15 Q. All right. Well, let's show the jury.

16 So, Iris, you identified that as your husband?

17 A. Yes.

18 Q. Tell the jury about your husband?

19 A. My husband has been a big help to me. He is a good
20 man. He helped my family, too. We both really love each
21 other.

22 Q. And at some point -- the help your husband gave to you,
23 did he become part of the organization as a coconspirator?

24 A. Yes.

25 Q. And he's already pled guilty to that, is that right?

1 A. Yes. (In English) I'm sorry.

2 Q. Do you need a Kleenex?

3 A. (In English) I'm sorry.

4 Q. And Iris, can you tell the jury about what your husband
5 did to help the organization?

6 A. My husband had helped me by take me to work and
7 helping me send the money back to Thailand so that I
8 could help my family.

9 Q. He did that. Did he help other women who were under
10 debt to M?

11 A. Yes, he did.

12 Q. How did he help them?

13 A. The incident happened here in -- in this state when M
14 had closed the house and she disappeared.

15 There were two women who were here for two,
16 three months. They worked and they sent all the money to
17 M and didn't have money with them.

18 I had asked my husband to help them out and buy
19 ticket to send them back to Thailand.

20 Q. And who were those women, Iris?

21 A. One girl's name's Bu and another named Ne.

22 Q. And were those girls under debt to them?

23 A. Yes.

24 Q. And when did M's house close?

25 A. I remember it was about 2015 in April.

1 Q. And why did M's house close?

2 A. M said that nobody was handling the ad.

3 Q. And what does that mean?

4 A. Nobody would post the advertising.

5 Q. Was there any reason the house closed?

6 A. That's what M said.

7 Q. And so at that point in time, there were two women
8 stranded here?

9 A. Yes. Included me, too.

10 Q. Was there anywhere for those women to go?

11 A. No. They couldn't go anywhere because nobody bought
12 them tickets and they had no money at all.

13 Q. So it was at that point where you said you and your
14 husband helped them?

15 A. Yes.

16 Q. And where are those women now?

17 A. I'm not sure if they are still in Thailand. Because
18 after I bought them the ticket to Thailand, I hadn't
19 haven't had any contacts with them.

20 Q. What about after M's house closed here? Did you
21 continue to have contact with M?

22 A. No.

23 Q. And why not?

24 A. M had disappeared.

25 Q. And describe for the jury what you mean by M had

1 disappeared.

2 A. I couldn't get ahold of her at all and her phone
3 number was shut down. But I was able to contact with Tu,
4 who's her boyfriend.

5 Q. And what did you learn in contacting Tu?

6 A. This I don't really remember.

7 Q. But since that date, when the Minnesota house is closed,
8 you said that was April of 2015?

9 A. Yes.

10 Q. You haven't had communication with M?

11 A. No.

12 Q. Let's talk about the last time you worked out of M's
13 house here in Minnesota?

14 A. Yes.

15 Q. I'm going to approach with Government's Exhibit 501,
16 1250, which is a certified business record, and 1200.

17 MR. RIVERS: You said 1250 and what was the other
18 one?

19 MS. PROVINZINO: 501, 1250 and 1200.

20 BY MS. PROVINZINO:

21 Q. Can I have you look at Government Exhibit 501, first?

22 A. Yes.

23 Q. Do you see that?

24 A. Yes.

25 Q. And do you recognize the photos in that exhibit?

1 A. Yes, I do.

2 Q. And those are photos of you?

3 A. Yes.

4 Q. And sent by M, August 16th of 2014?

5 A. Yes.

6 MS. PROVINZINO: The Government moves the
7 admission of Exhibit 501.

8 MR. SICOLI: No objection.

9 MR. GERDTS: No objection, Your Honor.

10 THE COURT: Received.

11 BY MS. PROVINZINO:

12 Q. I'm just making that a little bit bigger for the jury.
13 And that's you, as Lily. And there are two attachments,
14 Chaba, photos of you, is that right?

15 A. Yes.

16 Q. We'll focus on the second page of that. Where was that
17 photo taken, Iris?

18 A. In Thailand.

19 Q. And was that the one you said you took at Toilet?

20 A. Yes.

21 Q. And then do you see Government Exhibit 1200 in front of
22 you?

23 A. I do.

24 Q. And what is that?

25 A. It was my working picture.

1 Q. Okay. And is that your working picture on an ad for
2 sex?

3 A. Yes.

4 Q. For October 5th of 2014?

5 A. Yes.

6 MS. PROVINZINO: The Government moves the
7 admission of Exhibit 1200.

8 MR. SICOLI: No objection.

9 MR. ENGH: No objection, Your Honor.

10 THE COURT: Received.

11 BY MS. PROVINZINO:

12 Q. Iris, let's walk the jury through this. You're familiar
13 with backpage ads, is that right?

14 A. Yes.

15 Q. So this one is listed for Minneapolis St. Paul, is that
16 right?

17 A. Yes.

18 Q. And there's a -- who's in this photo on the first page?

19 A. It's my picture.

20 Q. And where is that picture taken?

21 A. In LA.

22 Q. Who did you take that picture with?

23 A. A photographer.

24 Q. And did anyone take you to get that picture taken?

25 A. Yes, there was.

1 Q. And who took you get that photograph taken?

2 A. Moo did.

3 Q. And so the ad has additional photos of you, is that
4 right?

5 A. Yes.

6 Q. And where was this photo in the black dress taken?

7 A. Also taken in LA, as well.

8 Q. And then this one looks familiar here, is that right?

9 A. Yes.

10 Q. And that was the one at Toilet in Thailand?

11 A. Yes.

12 Q. And there's a description. I want to ask you a few
13 questions about this.

14 Was this how a typical ad at one of M's house
15 would read?

16 A. Yes.

17 Q. And there's a reference here to donation, 170 an hour?

18 A. Yes.

19 Q. What does that mean?

20 A. Customer for one hour they pay \$170.

21 Q. And lists the open times from 9:00 a.m. to 11:00. Was
22 that the typical hours you would work here?

23 A. Yes.

24 Q. If we go down to Page 5. Information about how the ad
25 is posted.

1 So and it was posted from the e-mail
2 sandy.namfon@gmail.com. Do you see that?

3 A. Yes.

4 Q. And do you recognize that e-mail?

5 A. I don't know this e-mail at all.

6 Q. And there's a recent name listed that says a Soysuda
7 Siangdang. Do you recognize that?

8 A. I do.

9 Q. Who was that?

10 A. It's Soy.

11 Q. And who is Soy?

12 A. Soy is another girl who was arrested as well, that I
13 met in Sherburne.

14 Q. And did Soy assist M with her houses in Minnesota?

15 MR. GERDTS: Objection, Your Honor. Foundation.
16 She met her in Sherburne.

17 THE COURT: Well, I'll -- I'll allow the inquiry.
18 But ask you to rephrase the question.

19 BY MS. PROVINZINO:

20 Q. Soy's name is listed on this backpage ad of you?

21 A. Yes.

22 Q. Do you know what role Soy played?

23 A. I just know now.

24 Q. And what is it?

25 THE COURT: Well, source of information, and

1 timing of when she -- when it was received.

2 BY MS. PROVINZINO:

3 Q. When did you learn that information?

4 A. Just when the Government showed me.

5 Q. And when you were working for M, who posted
6 advertisements?

7 A. I don't really know.

8 Q. So you didn't know that during the time you were working
9 for M?

10 A. Yes.

11 Q. But that wasn't something that you did, is that right?

12 A. Yes.

13 Q. So that would be something that M or another member of
14 the organization would do?

15 A. Yes.

16 MS. PROVINZINO: And permission to approach with
17 Government Exhibit --

18 THE COURT: You may --

19 MS. PROVINZINO: -- 1013.

20 BY MS. PROVINZINO:

21 Q. And do you recognize the individual in the photograph in
22 Government Exhibit 1013?

23 A. I do.

24 Q. And who is that?

25 A. It's Soysuda.

1 MS. PROVINZINO: The Government moves admission of
2 Government Exhibit 1013.

3 MR. GERDTS: I object on relevance grounds.

4 MR. GUERRERO: Same objection.

5 THE COURT: I'll provisionally receive until I've
6 heard direct and cross on the relevance of the individual in
7 the photo.

8 BY MS. PROVINZINO:

9 Q. So making this larger for the jury. Iris, this is an
10 individual you've identified as Soy?

11 A. Yes.

12 Q. Do you know what Soy did for the organization?

13 THE COURT: Just -- I guess we should establish
14 when she found out and from what source.

15 MS. PROVINZINO: Okay. I'm satisfied with where
16 we're at on that, Your Honor.

17 THE COURT: All right.

18 BY MS. PROVINZINO:

19 Q. The last one, I think there might be an exhibit in front
20 of you that's identified as Exhibit 1250.

21 MS. PROVINZINO: And these are a certified
22 business records. I move the admission under that ground.

23 MR. GERDTS: As far as I can tell, Your Honor it's
24 completely irrelevant.

25 THE COURT: Is there --

1 MS. PROVINZINO: Your Honor, this relates to the
2 count relating to the Mann Act. And this is the actual
3 purchase of the flight for this witness to come to Minnesota
4 to engage in commercial sex acts that ties up with the
5 backpage ad just admitted as Government's Exhibit 1200.

6 MR. GERDTS: Well, that's a nice explanation, but
7 no, that's not true.

8 THE COURT: Well, separate from that, whether --
9 is there going to be any inquiry of this -- of this witness
10 on this exhibit?

11 MS. PROVINZINO: To establish the name and the
12 e-mail account associated with it.

13 THE COURT: Well, before it's offered, why don't
14 we just -- I'll allow some inquiry of this witness. And
15 then we'll go from there before I rule, with input from
16 Counsel.

17 MS. PROVINZINO: Okay.

18 BY MS. PROVINZINO:

19 Q. And Iris, then directing your attention to the top left
20 under passenger information, and there's a name listed?

21 A. Yes.

22 Q. And whose name is that?

23 A. That's my name.

24 Q. And this is for a ticket on October 3rd of 2014 on
25 American Airlines, is that right?

1 A. (In English) I'm sorry. (Through Interpreter) Can
2 you say again?

3 Q. Yes. At the very top of the record, it just says
4 American Airlines, right?

5 A. Yes.

6 Q. So this is an American Airlines record for a ticket for
7 you, is that right?

8 MR. GUERRERO: Objection to form.

9 THE COURT: And the name on the ticket is?

10 BY MS. PROVINZINO:

11 Q. And let's focus on that. On the top left it says,
12 Flanigan Chabaprai?

13 A. Yes.

14 Q. And who is that?

15 A. It's my name and my husband last name.

16 Q. And so is that your married name?

17 A. Yes.

18 Q. So is this ticket for you?

19 A. Yes.

20 MS. PROVINZINO: The Government moves the
21 admission of that as a certified business record.

22 MR. GERDTS: No objection, Your Honor.

23 MR. SICOLI: No objection.

24 MR. GUERRERO: No objection.

25 THE COURT: Received.

1 BY MS. PROVINZINO:

2 Q. And Iris, this doesn't look like the way we buy tickets,
3 does it?

4 A. I don't understand the question. I'm sorry.

5 Q. This is a business record, not the way an airline looks
6 to you or me, is that right?

7 A. That's correct.

8 Q. But I just want to confirm on here that Chabaprai
9 Flanigan on the top of this record, that's you, is that
10 right?

11 A. Yes.

12 Q. Now while you were out of debt, in addition to working
13 in Minnesota, you worked in other cities, is that right?

14 A. Yes.

15 Q. And what cities did you work in?

16 A. In Atlanta. Minnesota. California. Houston.
17 Austin.

18 Q. All right. And when you worked in California, who did
19 you work for?

20 A. I worked with Vietnamese person.

21 Q. And you worked in Houston. Who was that with?

22 A. It was a Thai house belonged to a person named Pla
23 and Du.

24 Q. How about in Austin?

25 A. I went there.

1 Q. And how did you go there?

2 A. Kung, Saowapha.

3 Q. And who is Kung?

4 A. She's sitting here.

5 Q. And can you identify her for the jury?

6 A. Yes.

7 Q. Could you either describe what she's wearing or point to
8 her for the jury?

9 A. Yes.

10 Q. And I'll allow you to do that now.

11 A. Kung is wearing a long-sleeved. Gray long-sleeved
12 and wearing glasses.

13 MS. PROVINZINO: Let the record reflect that the
14 witness has identified who she knows to be Kung. Defendant
15 Saowapha Thinram here in the courtroom.

16 THE COURT: So reflected.

17 BY MS. PROVINZINO:

18 Q. How did you find out about Kung's house?

19 A. There was a woman named Edna introduced me.

20 Q. And when did you go to plan to work for Kung?

21 A. I remember really it was in July of 2016. But I
22 don't recall the date.

23 MS. PROVINZINO: May I approach with Government's
24 277 and 276?

25 THE COURT: Yes.

1 BY MS. PROVINZINO:

2 Q. And I'll give you a movement to look at those
3 Government's Exhibit 276, and 277.

4 You've had a moment to review them?

5 A. Yes.

6 Q. And what are these two exhibits, Iris?

7 A. I had sent an e-mail to sexynancyaustin@gmail.com.

8 Q. And who is sexynancyaustin@gmail.com?

9 A. It's Khun Kung.

10 Q. And why did you send the e-mail?

11 A. I wanted to go to work at her house.

12 MS. PROVINZINO: Government moves the admission of
13 Government Exhibits 276 and 277.

14 MR. ENGH: No objection.

15 THE COURT: Received.

16 BY MS. PROVINZINO:

17 Q. We'll show the first, 277. We'll make this a little
18 larger to see. So the pet1138, is that your e-mail, Iris?

19 A. Yes.

20 Q. And you remember the date to be in July, is that right?

21 A. Yes.

22 Q. Looks like 201, is that right?

23 A. Yes.

24 Q. And sexynancyaustin@gmail.com, that's the e-mail that
25 Kung uses, is that right?

1 A. Yes.

2 Q. And Ploy, that's one of your nicknames?

3 A. Yes.

4 Q. And you sent a photo?

5 A. Yes.

6 Q. So let's talk about your time in Austin. Tell the jury
7 what you remember about that?

8 A. Okay. So I had booked the job at Khun Kung's house
9 in Austin.

10 When I arrived there, her husband picked me up.
11 When I went there the house was an apartment with two
12 bedroom. Was on the first floor. I only went there for
13 five days and I had to leave.

14 Q. Now you said Kung's husband picked you up at the
15 airport?

16 A. Yes.

17 Q. And did you deal with him during the time you were in
18 Austin?

19 A. He sent me customers. He also took me to buy food
20 stuff.

21 Q. I'm showing you what's already an admitted as Government
22 Exhibit 1068.

23 And I'll make that larger for you to see, Iris.
24 Who is that in Government Exhibit 1068?

25 A. This is the man who is husband to Khun Kung and also

1 who picked me up at the airport.

2 Q. And what did you call him?

3 A. I called him Gregg something like that.

4 Q. Gregg?

5 A. Yes.

6 Q. So he picked you up at the airport and bought food for
7 you. And took you to the apartment, is that right?

8 A. No. He picked me up at the airport and then dropped
9 me off at the apartment. After that, a couple days, then
10 he took me to buy food. I'm not sure whether it was a
11 couple days or one day.

12 Q. Thank you for clarifying that.

13 And during the time you were at the apartment, you
14 saw customers, is that right?

15 A. Yes.

16 Q. And tell the jury about your experience with customers
17 there.

18 A. So I went to work there only for four days. The
19 fifth day I decided to leave.

20 The first day that I was there, I was worked
21 and having seven customers. The next morning the review
22 came up and it was bad.

23 And the following days I did not have any
24 customers. So I asked to go to leave.

25 Q. And tell the jury about that the bad review, or the

1 experience that led to that?

2 A. So the house owner had notified me that the review
3 was not good. I was like somebody who had stretch marks,
4 as if somebody who had pregnant before. But I didn't
5 access the review and looked at it because I didn't know
6 how. But the house owner had notified me that's how I
7 knew.

8 And then after that, the next morning, Khun Kung's
9 husband had come in and wanted to take a look.

10 Q. But what -- you had an unusual experience with a
11 customer, is that right?

12 A. Oh, yes, yes.

13 Q. And tell the jury about what that customer wanted you to
14 do?

15 A. So the customer was a regular customer at Kung's
16 house, that he came the first morning. And that we were
17 taking a bath. After that he pour oil all over me. And
18 I wanted to have me lie down on the bathtub and having
19 sex there.

20 And I told him I couldn't do this, because it's
21 not safe. Let's go do it on the bed.

22 Q. And what happened?

23 A. So in the evening the customer had written the bad
24 review for me and, therefore, that made me for no more
25 customers coming in.

1 Q. And so how did Kung or her husband respond to that bad
2 review?

3 A. So he came in the next morning and to see if it was
4 true what was written.

5 In the morning, I was wearing the bikini to show
6 him that it's not -- it was not like what it was written as
7 customer had said.

8 Q. Did he take photographs of you?

9 A. Khun Kung's husband didn't take pictures of me. I
10 asked the girl who was working at the time with me to
11 take pictures instead.

12 Q. So who was the girl working with you at that time?

13 A. Her name was Jom.

14 Q. And who was Jom?

15 A. She was M's girl.

16 Q. And was she -- when you say she was M's girl, was she
17 under debt at that time?

18 MR. ENGH: Objection. Leading.

19 THE COURT: Sustained as to the form.

20 BY MS. PROVINZINO:

21 Q. When you say Jom was M's girl, can you describe what
22 that means?

23 A. M's girl meaning she had to come and pay the debt
24 back to M.

25 MS. PROVINZINO: I'm going to approach with

1 Government Exhibit 304.

2 BY MS PROVINZINO:

3 Q. It's an e-mail with a collection of photographs. I want
4 to see if you recognize those.

5 And do you know, do you recognize the individual
6 in those photographs?

7 A. Yes, I do.

8 Q. And who is it?

9 A. Jom.

10 MS. PROVINZINO: The Government moves admission of
11 Exhibit 304.

12 MR. ENGH: No objection.

13 THE COURT: Received.

14 BY MS. PROVINZINO:

15 Q. All right. We'll just make this a little bit bigger for
16 the jury to see.

17 So that's an e-mail sent to catcat that's M, is
18 that right?

19 A. Yes.

20 Q. Subject is Jom, the girl we're talking about?

21 A. Yes.

22 Q. Did you know this e-mail, this tonbm@hotmail.com is?

23 A. I don't know.

24 Q. There appears to be e-mails from Toilet Studio. Do you
25 see that?

1 A. Yes.

2 Q. That's the same place your photos were originally taken,
3 is that right?

4 A. Yes.

5 Q. Okay. And we'll scroll to Page 2. Who is that in the
6 photo?

7 A. It's Jom.

8 Q. What happened regarding that bad experience you had at
9 Kung's house?

10 A. So I felt bad, because I wasn't able to make any
11 money for Khun Kung and myself so I asked to go home on
12 the fifth day.

13 Khun Kung was really nice. She understands and
14 she was okay with it.

15 Q. And so then what happened?

16 A. So I went back home and I thought I wouldn't go work
17 anywhere else anymore.

18 I was having the intention to go study English
19 so that I could find a different -- another job, a new
20 job. And I had opened up a house in Atlanta at the --
21 during that time.

22 BY MS. PROVINZINO:

23 Q. Now you mentioned the reason you went to Pi Kung's place
24 was to connect with someone named Anna, right?

25 A. Yes, so we could meet.

1 Q. Did you end up meeting her?

2 A. No, I did not.

3 Q. I'm going to approach with Government Exhibit 16B, which
4 is already admitted into evidence.

5 I was going to have you take a look at the photos
6 on the right of that exhibit?

7 A. Yes.

8 Q. And who was that?

9 A. That's Anna.

10 Q. I'm publishing for the jury -- the photos on the right.
11 You said that's Anna?

12 A. Yes.

13 Q. And who's Anna?

14 A. She was a girl who came to work to pay off debt to M,
15 as well.

16 Q. Was she able to pay off her debt?

17 A. Yes, she did.

18 Q. And did she continue to work for the organization?

19 A. Yes.

20 Q. What did she do?

21 A. She was helping taking care of the girls for M.

22 Q. And so you talked about not wanting to work commercial
23 sex acts to go from house to house after Austin, is that
24 correct?

25 A. Yes.

1 Q. And going back to Atlanta?

2 A. Yes.

3 Q. And opening a house?

4 A. Yes.

5 Q. Tell the jury about that?

6 A. So after I came back from Khun Kung's house, I went
7 home for about one or two months. And then I was
8 thinking I did not want to travel and work anymore. I
9 wanted to go back and study English so I can find a
10 different job.

11 So I opened up a working house so I could work
12 after class. Because I wanted to help -- help my husband's
13 burden sending money back to my family.

14 Q. How did you open a house?

15 A. There was a Vietnamese man who helped me.

16 Q. And who was that person?

17 A. His name was Ahthi.

18 Q. I'm approaching with Government Exhibit 1031. And as I
19 do that, explain for the jury how Ahthi helped you.

20 A. Yes.

21 Q. And do you recognize the individual in Government
22 Exhibit 1031?

23 A. Yes.

24 Q. And who is that?

25 A. He's Ahthi.

1 MS. PROVINZINO: The Government moves the
2 admission of 1031.

3 MR. GUERRERO: No objection.

4 MR. SICOLI: No objection.

5 MR. GERDTS: No objection.

6 THE COURT: Received.

7 BY MS. PROVINZINO:

8 Q. So that's the individual you worked with as a co-house
9 boss in Atlanta, is that right?

10 A. Yes.

11 Q. And what role was Ahthi going to play?

12 A. Ahthi was going to pick up the phone and send
13 customers over to the apartment.

14 Q. Who was going to place ads?

15 A. I hired somebody to do it. I put the ad in the
16 Mexican -- in a Mexican newspaper.

17 Q. And what role were you going to play?

18 A. I was a house owner.

19 Q. And as a house owner, what did you do?

20 A. I would collect the house fee from the girls, \$40 per
21 one customer.

22 Q. And would you keep the full house fee?

23 A. No, it's not.

24 Q. And tell the jury what --

25 A. I had divided \$20 to Ahthi and I would keep \$20.

1 And I would use this money to pay for the
2 apartment rent and buy the stuff and food for the girls at
3 the house.

4 Q. Who worked at your house?

5 A. Will there were Anna, Lulu, Jom, Jane. I couldn't
6 recall all of them.

7 Q. And how did you know the women?

8 A. When we worked, we met each other. And Anna was my
9 good friend.

10 Q. And were those individuals still under debt?

11 A. All of them had paid off their debt.

12 Q. And who did they owe their debt to?

13 A. As far as I had mentioned, Anna was in debt to M.
14 Lulu was in debt to M. And Jom was in debt to M. And
15 that's all I remember.

16 Q. Did you also continue to provide commercial sex services
17 at your house?

18 A. I did it every once in a while.

19 Q. And why did you do it every once in a while?

20 A. Because I went to study. When I -- by the time I
21 came home, it was already in the afternoon. There would
22 be no customers. But if there were customer I would give
23 them to my -- to the working girls at my house.

24 MS. PROVINZINO: Now approaching with Government
25 Exhibits 36, A, B and C.

1 First, I'll have you take a look at Government
2 Exhibit 36 and see if you recognize that.

3 A. This was my password -- this was my password for my
4 phone.

5 Q. And you can open the case up and see if you recognize
6 what's in there.

7 A. It is my -- it was my phone.

8 Q. That was your phone. Okay. And you allowed the
9 Government to -- you gave us consent to review it, is that
10 right?

11 A. Yes.

12 MS. PROVINZINO: The Government moves admission of
13 Exhibit 36.

14 MR. GERDTS: No objection.

15 MR. SICOLI: No objection.

16 THE COURT: Received.

17 BY MS. PROVINZINO:

18 Q. And we were able to pull some records off that phone, is
19 that right?

20 A. Yes.

21 Q. And I'll focus your attention on Government Exhibit 36C.
22 And is that a screen capture on your phone?

23 A. Yes.

24 Q. And that was on -- that's on your phone for a Days Inn
25 of Eagan near Mall of America, is that right?

1 A. Yes.

2 MS. PROVINZINO: The Government moves admission of
3 Exhibit 36C.

4 MR. SICOLI: No objection.

5 MS. PROVINZINO: All right.

6 THE COURT: Pro -- or received.

7 MS. PROVINZINO: Thank you, Your Honor.

8 BY MS. PROVINZINO:

9 Q. And this is for a Days Inn with a check-in date of
10 July 13th and a checkout of July 20th, 2015, is that right?

11 A. Yes.

12 Q. And who was working at the Days Inn for that week?

13 A. It was me. I had gone there to visit with John and I
14 had booked the hotel for working for myself.

15 Q. Okay. And do you see Government Exhibit 36B in front of
16 you?

17 A. Yes, I do.

18 Q. And is that a photograph you took of two receipts?

19 A. Yes.

20 MS. PROVINZINO: Government moves the admission of
21 36B.

22 MR. GUERRERO: No objection.

23 MR. SICOLI: No objection.

24 MR. GERDTS: No objection.

25 THE COURT: Received.

1 BY MS. PROVINZINO:

2 Q. These are Wells Fargo receipts. I just want to focus
3 your attention on the date here, what date was that?

4 A. It's on the 17th of July on 2015.

5 Q. And is that the same on the other receipt?

6 A. Yes.

7 Q. And what's the quantity -- or the amount?

8 A. \$2,030.

9 Q. And is there anything significant about that amount,
10 Iris?

11 A. I don't remember whose accounts I had deposited the
12 money in. But I remember that it had divided into two
13 accounts in the same equal amount.

14 Q. Okay. And when you say two accounts -- just so we're
15 focusing on here, one account ending in 0646 and one ending
16 in 7883?

17 A. Yes.

18 Q. And why did you do it that way?

19 A. Because the accounts owner wanted me to send the
20 money, \$2,030 into the account. The person didn't want
21 me to send 4,000 all at once into one account.

22 Q. And who was it that asked you to put it into two
23 different accounts?

24 A. It's the account owners, but I don't remember who
25 that person is.

1 Q. And do you see Exhibits 36A in front of you? Which is
2 some of your text messages.

3 A. Yes.

4 Q. And did you have a chance to review all the translations
5 of those?

6 A. Yes, I did.

7 Q. And from the Thai into English, are those accurate,
8 Iris?

9 A. Yes, correct.

10 MS. PROVINZINO: The Government moves the
11 admission of Exhibit 36A.

12 MR. ENGH: No objection.

13 MR. GERDTS: No objection.

14 THE COURT: Received.

15 MR. SICOLI: No objection.

16 BY MS. PROVINZINO:

17 Q. All right. And we'll just walk the jury through a few
18 of those records.

19 All right. And here we see a few of the people
20 you're communicating with.

21 A. Yes.

22 Q. Who is Lulu?

23 A. She was a girl who came to work off to pay the debt
24 to M.

25 Q. And is this Ann the person we've already talked about

1 that you've identified in the photos?

2 A. Yes.

3 Q. And there are a few things over here, including, let's
4 look at this exhibit?

5 A. Yes.

6 Q. And there's a name, Pornthep Sukprasert. Do you know
7 who that is?

8 A. Yes.

9 Q. And a Bank of America account number?

10 A. Yes.

11 Q. And a reference to \$9,000. Do you remember that?

12 A. I don't remember.

13 Q. And let's look at this reference here.

14 And that translates, "This is P'Kung's phone
15 number. I already sent a message to her. Will call back."
16 Is that right? And I'll blow that whole --

17 And was that time you went to at P'Kung in Austin?

18 MR. ENGH: Objection as to leading.

19 THE COURT: Sustained as to form.

20 BY MS. PROVINZINO:

21 Q. And what was the reference to P'Kung's phone number?

22 A. I think that Anna had sent me the phone number of
23 P'Kung to me.

24 Q. Let's jump over to the next page. All right. There's
25 another reference to a bank account at Wells Fargo set for

1 Sawitree Manorat. Do you know who that is?

2 A. No, I don't.

3 Q. Now you've already identified Anna.

4 A. Yes.

5 Q. Now I'm going to approach with Government Exhibit 1014.

6 And do you recognize the individual in the
7 photograph for Government Exhibit 1014?

8 A. I do.

9 Q. And who is that?

10 A. It's Lulu.

11 MS. PROVINZINO: Government moves admission of
12 Exhibit 1014.

13 MR. SICOLI: No objection.

14 THE COURT: Received.

15 BY MS. PROVINZINO:

16 Q. All right. And so that's that individual Lulu that you
17 were in text communication with?

18 A. Yes.

19 Q. And who did Lulu owe her tax to?

20 A. It was M.

21 Q. Now Iris, after you met with the Government, did you
22 have any concerns for yourself or your family?

23 A. Yes, there was.

24 Q. And can you explain that to the jury?

25 MR. GERDTS: Objection on relevance grounds, Your

1 Honor.

2 THE COURT: Overruled. I'll admit -- I'll allow
3 it. You may answer.

4 A. After I met with the Government for the first time,
5 there was police come over to look for my father in the
6 at the province in Thailand.

7 Q. And what happened?

8 THE COURT: Mr. Gerdts?

9 MR. GERDTS: Objection on foundation, and probably
10 hearsay grounds.

11 THE COURT: Okay. Counsel?

12 MS. PROVINZINO: It's not offered for the truth of
13 the matter, but it goes to state of mind and the impact on
14 the witness.

15 THE COURT: I'll permit with an instruction to the
16 jury, unrelated to any ruling I make, we've had my Court
17 Reporter and interpreter and everybody else in here for
18 about an hour and 35 minutes. So, I don't know if there's a
19 logical place to break.

20 And then, of course, then we have the issue of --
21 if we're going to take a 15-minute break, then we probably
22 might as well -- unless you're saying, well, just give me a
23 few more minutes and I'm done, with the -- I just want to
24 find -- well, first let me make a ruling.

25 Members of the Jury, I'm going to allow her to

1 make a response, apart from what she learned, whether it was
2 entirely true or entirely false, or something in between.

3 I will allow it for the limited purpose of saying,
4 Well, why was she thinking or feeling the way she was?
5 Whether -- regardless of what she was told whether it was
6 true or false.

7 So it's not allowed for whether it's true, because
8 it may be true, or false.

9 But I'll -- I'll permit it with that limited
10 direction to you by the Court.

11 You may have to rephrase the question.

12 BY MS. PROVINZINO:

13 Q. And why were you concerned for your father at that
14 time?

15 A. Because the police went over to looking for my dad,
16 even though before -- before this happened, nobody ever
17 come look for me or my father.

18 During the time that my police came look for my
19 father, they -- they couldn't find him because my father
20 traveled to Bangkok to visit with my sister.

21 The head of the village had called my father.

22 MR. ENGH: Can we have a standing objection to
23 this, Your Honor?

24 THE COURT: Yes, you know. Yes. Standing
25 objection. And with the same instruction to the jury,

1 separate from whether it's true or whether it's false, why
2 she is stating that she was concerned. I'll allow it.

3 A. So the police had contacted the head of the village
4 to have him call my father to come back to the village
5 the same day.

6 My father had traveled from Bangkok to Buriram
7 on that day and met with the police at a gas station.

8 What I was worried about was the police was not
9 wearing uniform and he took a lot of pictures of my
10 father. And that's what my father told me, the story.
11 Yes.

12 MS. PROVINZINO: At this point, Your Honor, we'll
13 yield a break to the interpreter and to your Court Reporter.
14 And then I will defer to the Court as to whether we resume
15 yet today or come back tomorrow morning.

16 THE COURT: Well, it seems to me that even though
17 it might not be the perfect spot to -- rather than complete
18 the direct, that if we took a legitimate break, it's going
19 to be then close to 5:00.

20 We promised the jury we'd try to recess at 5:00.

21 So, will that work for everybody, including
22 Defense Counsel?

23 MR. RIVERS: Yes, Your Honor.

24 THE COURT: Now the schedule says 10:00 tomorrow
25 morning, because of a commitment I have, not the lawyers.

1 But if I change that to say we'd start at 9:30
2 instead of 10:00, would that work for everybody here?

3 I haven't asked the lawyers yet, so I'll have to
4 ask them, too. So I apologize to everyone for this
5 last-minute possible change.

6 But would that work for everybody here?

7 THE JURORS: Yes.

8 THE COURT: Would that work for Counsel here? Or
9 because you may have legitimately relied on that schedule
10 everybody got three weeks ago that said 10:00 tomorrow
11 morning.

12 Does 9:30 work for everybody?

13 MR. SICOLI: It does for me.

14 MR. GUERRERO: It does for me.

15 MR. RIVERS: Yes, Your Honor.

16 MR. GERDTS: Yes.

17 MS. PROVINZINO: It works for the Government, Your
18 Honor.

19 THE COURT: All right. So what we'll do, Members
20 of the Jury, and if you recall the -- we'll be down because
21 of the Thanksgiving weekend on Wednesday, Thursday, Friday.
22 That won't be changing.

23 And then we'll be discussing tomorrow a little
24 bit, even though I think we're substantially on schedule.
25 We'll -- from that, there is no calendar you received,

1 during jury selection.

2 We'll discuss whether -- whether it's a half day
3 or a full day, or once I've had a chance to consult with
4 Counsel, whether, if we scheduled not this week, but
5 schedule a half day or full day, and a couple days there,
6 where it says we would be off either part of the day or all
7 day.

8 We'll see if that works. Because I'm in the
9 process of looking at that schedule just to give us those
10 options, if it works for everyone here, including the 15 of
11 you.

12 So with that, safe travels. And we'll stand in
13 recess until 9:30 tomorrow morning. Stand in recess.

14 (Jurors excused at 4:45 p.m.)

15 THE COURT: Do you have ballpark idea about when
16 you might complete your direct.

17 MS. PROVINZINO: Probably -- it would have pretty
18 close, probably 15, 20 minutes.

19 THE COURT: All right. We'll proceed on then with
20 examination then.

21 And then I'm not going to ask Defense Counsel what
22 their estimates are for cross.

23 Then you have the -- the other witness that you
24 gave us the --

25 MS. PROVINZINO: Sawitree Manorat.

1 THE COURT: Yes. Tomorrow. We're in the process
2 of contacting additional attorneys on a couple of these
3 dates to see if we can capture an additional day where we're
4 down or a half a day and convert it to a full day.

5 But I won't do any of that until I get
6 confirmation with Ms. Sampson. We'll discuss that sometime
7 tomorrow. If not sooner, than noon -- over the noon hour at
8 some point.

9 And I couldn't tell Mr. Engh, if you were going to
10 head to the podium?

11 MR. ENGH: Yes.

12 THE COURT: All right.

13 MS. PROVINZINO: May we excuse the witness, Your
14 Honor?

15 THE COURT: Yes. Yes.

16 MR. ENGH: I'll wait until she's gone.

17 THE COURT: Okay.

18 (Witness excused at 4:47 p.m.)

19 THE COURT: Mr. Engh.

20 MR. ENGH: Your Honor, the Defense renews the
21 hearsay objection to the witness's testimony as to the Thai
22 police incident with her father.

23 With all due respect, again, I believe the Court
24 has committed error. This evidence was offered for the
25 truth of the matter.

1 But moreover and more critically, there is no
2 tie-in between the stoppage of the father by the Thai police
3 in this case.

4 And what the evidence does instead is create an
5 inference -- an adverse inference where the Defendants --
6 that somehow her cooperation caused the Thai police to act
7 the way they did.

8 And there's absolutely no proof, nor will there
9 ever be any proof of a tie-in with this case, at least in my
10 the reading of all the records here.

11 So I believe that you committed error.

12 And, again, in all due respect. And the remedy
13 for the error is to strike the testimony. I move to strike
14 the testimony. Or in the alternative I move for a mistrial.

15 This is -- it's just egregious evidence that is
16 highly damaging to us. And it has no foundation in the
17 case.

18 MS. PROVINZINO: Well --

19 MR. RIVERS: I would join, Your Honor.

20 THE COURT: All right. Mr. Gerdts?

21 MR. GERDTS: Your Honor, I would join.

22 And I would point out that Counsel, when she asked
23 about this, specifically asked, Well, did something happen
24 after you cooperated? Suggesting some logical relationship
25 in a -- in an in a directed question.

1 But, I mean, Aristotle, that long ago, already
2 told us that the post hoc propter hoc logic is fallacious.
3 And the witness did not even tell us, even in the hearsay,
4 when this thing took place.

5 So there's no -- even if it had some relevance, or
6 not terribly prejudicial, it's not -- it's not tied up.

7 MR. SICOLI: Your Honor, we would also join.

8 THE COURT: All right.

9 MR. GUERRERO: As we would, as well, judge.

10 MS. PROVINZINO: There is no error. And this is
11 directly related.

12 First, the Court was careful to give a limiting
13 instruction and to note the Government's not offering this
14 for the truth of the matter, that's an exception to hearsay.

15 It's relevant because time and again Defense
16 Counsel have inquired of witnesses as to whether they're
17 afraid, as to whether they have fear.

18 And that's part of the element of the sex
19 trafficking crime itself, force, threats of force, fraud and
20 coercion.

21 We've heard lots of testimony from the expert
22 about the very real -- the corruption in the police. The
23 fact that there are extra legal and extra judicial means to
24 go after individuals.

25 This certainly is a threat and a fear that

1 witnesses do have.

2 I would submit in the disclosures made by the
3 Government, there were translations of documents into Thai
4 by the Thai Government specifically relating to this case.
5 Including of the Defendants who have been charged.
6 Particularly in the United States versus Sumalee
7 Intarathong. That's been in disclosures to Defense Counsel.

8 In addition, the witness herself, approached the
9 Government after her initial proffer with the Government
10 through her Counsel Steve Wolter to disclose information she
11 had learned from her family about the police or an extra
12 legal entity coming after and approaching her father.

13 And it was directly tied to the timing of when she
14 had last proffered with the Government.

15 So I would submit all of this has been available
16 to Defense Counsel. There is no error in the Court's
17 ruling. It wasn't offered for the truth of the matter.

18 And it's directly relevant to the element of the
19 sex trafficking offense itself.

20 THE COURT: What -- what else is she going to say,
21 Counsel?

22 MS. PROVINZINO: There will be no further inquiry
23 into -- it was simply a question about whether she had
24 concerns for herself or her family.

25 MR. GERDTS: Your Honor, I think Counsel just

1 explained that it's not relevant to this case.

2 Whether there was force, fraud or coercion used in
3 the sex trafficking to compel sex trafficking has nothing to
4 do whether there was some threat because somebody's
5 cooperating with the Government. This is completely after
6 the fact and has nothing to do with the -- if it were true,
7 has nothing, at all, to do with whether anybody was
8 compelled to engage in sex work.

9 And so I -- it's -- it's a suggestion that may be
10 the Thai Government is trying to obstruct justice in some
11 way. But I don't see how that ties into any element of this
12 offense.

13 MS. PROVINZINO: And thank you, Your Honor.

14 The witness when she testified today, said about
15 four months into repaying her bondage debt to her trafficker
16 M -- she approached M and asked -- said she wanted to leave.
17 She wanted to quit, she wanted to walk away.

18 And at that point M said so her, that if you do
19 that without paying your debt, we will send people to
20 threaten your family in Thailand.

21 And I would suggest that Defense Counsel have
22 repeatedly asked of our witnesses questions about whether
23 they have exaggerated that fear for themselves of either
24 returning to Thailand or continuing to be part of the
25 organization.

1 And that's directly one of the elements, the force
2 and the threats of force, that compel someone to continue to
3 do the commercial sex acts of sex trafficking.

4 They even ask Mr. Alexander questions about fear
5 of returning to Thailand today. And they're -- so this is
6 directly relevant, both to this witness and to the whole
7 scope of this case, as it relates to the sex trafficking
8 counts.

9 THE COURT: Mr. Engh, or Mr. Gerdtz or anyone
10 else?

11 MR. ENGH: In our view it's improper to create an
12 inference without a fact.

13 And the -- what they've created, as articulated
14 now, is an inference of fear and a link to the case -- of
15 this case, to the Thai police.

16 And they have no fact to prove the conduct of the
17 police was related to her cooperation. They have an
18 inference without a fact. If they have a wiretap for M, if
19 they have an exact for M, with Thai police or an e-mail,
20 fine, show it to us. But they're creating something out of
21 fiction here. And that's why it's so egregious and wrong.

22 THE COURT: Well --

23 MR. ENGH: And it is offered for the truth of the
24 matter, in my view, my respectful view, and I know we
25 disagree on other things, too, over the years. But this one

1 I think you may be really wrong about, again, in all due
2 respect.

3 THE COURT: So we'll see if Government Counsel --
4 I'm assuming that they're going to say is, it was the --
5 apart from whether it was one of these Defendants, since
6 everybody keeps repeating -- emphasizing how there's all
7 these other individuals, known or unknown, how large the
8 organization is.

9 But I assume they're going to say, separate from
10 her testimony, that your client was very kind to her when
11 she was working there.

12 In light of what they said earlier, they went to
13 quote M, and she said, "Well, look at. If you go back
14 without paying your debt, your family could be in danger."

15 I'm assuming they're going to say, Well, it's the
16 timing of it that is the relevance, because I don't think
17 they claim they have a wiretap or anything else.

18 But saying, Well, it isn't fortuitous that shortly
19 after this happened the -- for the first time in the -- in
20 the life of this witness, the police wandered into their --
21 started asking questions of her father.

22 MR. ENGH: Well, you'd have to -- you'd have to
23 prove, it seems to me, that M knew that she was cooperating
24 or meeting with the police. And there's no evidence of
25 that.

1 THE COURT: I'll hear from Government and then
2 back to any Defense Counsel, and make a ruling. And then
3 we'll go.

4 MS. WILLIAMS: And as long as we're kind of
5 playing popcorn here.

6 Just to be clear, I think the Court is right to
7 note that the Government has not linked this improperly with
8 these Defendants.

9 I think the only two Defendants she's talked about
10 she's said were kind and nice, so -- so I think that -- that
11 is probably clear.

12 I also don't think the Government is saying this
13 was per se the Thai Government. I think the witness's
14 testimony stands on her own, which is she doesn't really
15 know what this is. It was weird and it makes her fearful.

16 But I would note, this issue of fear is something
17 that the Defense has infused into this case again, and
18 again, and again.

19 We haven't had a substantiative witness, Ms.
20 Sonprasit, Gangsmoo, Boonluea, even Mr. Alexander this
21 morning, which was a little absurd, because he's obviously
22 an American without family over there.

23 The witnesses have been asked very directly, well,
24 either you don't have a fear, or you're exaggerating your
25 fear. And fear isn't true and this fear isn't reasonable.

1 That's something that the Defense infused into the case.

2 And we're not saying that these Defendants are
3 threatening this witness. I don't think there's any
4 evidence of that.

5 But the Defense put it at issue. It's relevant,
6 not that it happened, but does she have fears in this case
7 and reasonably why. It's not been improperly linked to
8 these individuals. And seems totally responsive to what the
9 Defense is doing and the doors they've opened.

10 THE COURT: Anything else by Defense Counsel?

11 MR. GERDTS: I have a separate issue not on this,
12 though.

13 THE COURT: All right. Well, first the Court will
14 respectfully -- well, a couple things. It's going to come
15 up after the cross-examination's over.

16 But the Court will respectfully deny the motion
17 for a mistrial.

18 Let the record speak for itself of -- in terms of
19 what the relevance, probative value is, if any. And whether
20 that has been substantially outweighed by any unfair
21 prejudice in light of what's been said. With or without my
22 limiting instruction with respect to whether it was entirely
23 true or false.

24 And then I'll revisit the issue on my own, with or
25 without request for additional relief, depending on what, if

1 anything, is asked by Defense Counsel at the end of her
2 testimony. And then reserve the right, with or without
3 objection or request, to hear any additional request or
4 motions.

5 And to give -- reserve the right to strike the
6 testimony, deny to do that, give an additional limiting
7 instruction, depending on the position of the -- of the
8 parties.

9 So, unless there's a request for clarification,
10 I'll probably check in with Counsel at the end of the -- the
11 cross of this witness, whether or not there's been any
12 further inquiry by Defense Counsel.

13 Any request for clarification other than note the
14 objection by Defense Counsel of the Court's ruling?

15 MS. PROVINZINO: No further requests for
16 clarification.

17 THE COURT: Then realizing now I've had my
18 reporter in here for close to two hours, you, Mr. Gerdts,
19 said there was another issue -- separate issue you wanted to
20 raise?

21 MR. GERDTS: Yes, Your Honor. I object to, for
22 the record, and I would ask the Court to instruct Counsel
23 that it's inappropriate.

24 When I, for example, make an objection of
25 relevance or foundation to an exhibit that's not yet been

1 admitted. And Counsel's response in front of the jury is,
2 well, Your Honor, this is an e-mail for another trafficker
3 and what we think is going to happen is X, Y, and Z.

4 And so what Counsel does is makes this long
5 argument in front of the jury that has not yet been proved
6 up, just suggesting what she thinks might be proved in the
7 future and why the document might therefore become relevant
8 in the future. Or why the foundation might be laid.

9 That if she want to do that, explain to the Court
10 how she thinks it will become relevant, I don't object to
11 that. It's just doing it in front of the jury is
12 inappropriate, and introduces things into the case that are
13 not appropriately before the jury, at least at that point in
14 time.

15 THE COURT: Ms. Provinzino?

16 MS. PROVINZINO: I believe this is a two-way
17 street, Your Honor.

18 And Mr. Gerdts is making speaking objections and
19 putting information in front the Court.

20 We'll defer to how this Court wants to handle
21 that, whether we do that through sidebar or otherwise.

22 But I don't think I'm alone in making a response
23 to narrative objections in a narrative fashion. And before
24 the --

25 THE COURT: Well, I think part of what could be

1 part of this issue, because maybe, in the interest of trying
2 to minimize sidebars, obviously I don't think -- I think the
3 lawyers know that speaking objections are not proper, so I
4 don't think that's anything.

5 And so that, perhaps, then depending upon the
6 circumstances, it's just that with some of these exhibits,
7 sometimes they have a connection to some other exhibits, and
8 that's worked out, sometimes not.

9 But -- in either way, I'll probably encourage --
10 rather than try to minimize a sidebar, if somebody feels in
11 the fairness to their client, and the evidence, whether it's
12 Government or Defense lawyers, then we'll have the sidebar.
13 And I'll make sure -- that's my responsibility in the eyes
14 of the jury.

15 So we'll -- we will -- we'll do that, in addition
16 to checking in in the morning and during recesses about any
17 anticipated issues, so.

18 MS. PROVINZINO: That would be fine, Your Honor.

19 THE COURT: So can we get together about 9:25
20 tomorrow?

21 And I'll send Ms. Sampson down here earlier than
22 that in case I'm not back, but I should be before then to
23 say, Well, do you need to see the Judge before we continue
24 on with this witness?

25 Will that work for everyone ?

1 MS. WILLIAMS: Yes, Your Honor.

2 THE COURT: All right. So we shall see you in the
3 a.m., so?

4 (Court adjourned at 5:01 p.m.)

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UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

United States of America,)	
)	File Nos.
Plaintiff,)	17CR107(1) (4) (5) (16)
)	(20)
vs.)	(DWF/KMM)
)	
Michael Morris, Pawinee)	St. Paul, Minnesota
Unpradit, Saowapha Thinram,)	November 20, 2018
Thoucharin Ruttanamongkongul)	9:32 a.m.
and Waralee Wanless,)	
Defendants.		

BEFORE THE HONORABLE DONOVAN W. FRANK AND A JURY
UNITED STATES DISTRICT COURT JUDGE
(TRIAL TESTIMONY OF CHABAPRAI BOONLUEA)

APPEARANCES

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P R O C E E D I N G S

IN OPEN COURT

(Defendants present)

(Jurors excused at 9:32 a.m.)

THE COURT: Just briefly, before the jury comes in, sometime today I'll discuss with the jury, Ms. Sampson has talked to you -- it seems like, because I was able to move a couple things, so we could plan to go all day on December 4th.

And I had -- even though I could make some changes for that Friday, November 30th, we'll probably leave it as it is. And I was concerned, even if it worked out for everybody but the jury, often times jurors will say in a longer case, Well, our employer was counting on us being there on a Friday. And that's kind of built into the schedule. But the -- so I'll -- we'll just firm some of those things up later today.

And then we'll talk, if not at the morning break, at somewhere in the noon hour about the -- once and for all about the seating chart issue with the jury.

But all the jurors are here, so we'll proceed.

Witness can come in if you like?

MS. WILLIAMS: We have one issue, Your Honor.

THE COURT: All right.

MS. WILLIAMS: For the witness that's on the stand

1 currently, I had talked to Mr. Sicoli. I think he's the
2 only one that this concerns.

3 But I understand he's not going to go into the
4 specifics of Count 2, which involve this witness.

5 Certainly, the underlying facts, but not tie it
6 specifically into the indictment at this point in Count 2.
7 And we would seek that -- we would seek that for everyone.
8 I don't know that anyone's planning to do it, I think it
9 really only deals with Mr. Sicoli.

10 But -- and then I also wanted to alert the Court
11 to two scheduling matters.

12 First of all, Investigator Steve Baker with DOJ,
13 who's at the Government's table, has to catch a flight
14 tonight to get home for the holidays. So with the Court's
15 permission, he'll be gone after the last break of today.

16 THE COURT: All right.

17 MS. WILLIAMS: I just wanted to let the Court know
18 that.

19 And then also our afternoon witness, and I was
20 talking to Mr. Engh and Mr. Sicoli, who I think that witness
21 mostly concerns. I think we probably need to have a
22 discussion about some threats regarding that witness
23 potentially with the Court before she testifies.

24 And so what we would ask is, we think, kind of
25 looking at our timing, that this witness is going to take us

1 around to the lunch break.

2 But whenever that is, if we could take our lunch
3 break then, so then we'll have time to discuss it before the
4 afternoon witness gets on.

5 THE COURT: In other words, it looks like what
6 would serve everybody's interest is that, wherever the break
7 comes, that discussion should be had before she takes the
8 stand?

9 MS. WILLIAMS: Precisely.

10 And we -- we would request, I think we're going to
11 need a little break before she gets on the stand. We -- we
12 would -- assuming the timing works out, even if we have to
13 take a slightly early lunch.

14 THE COURT: That would be fine.

15 MS. WILLIAMS: Okay. Thank you.

16 THE COURT: Does that work for all Defense Counsel
17 as well?

18 MR. SICOLI: Yes.

19 THE COURT: All right.

20 MS. WILLIAMS: Thank you.

21 (In open court at 9:36 a.m.)

22 THE COURT: As then soon as the jury's ready, you
23 may proceed, Counsel. We'll wait for the interpreter to
24 come up.

25 MS. PROVINZINO: Thank you, Your Honor.

1 BY MS. PROVINZINO:

2 A. Hello. Judge Frank. Respectfully, greeting you.
3 Hello jury, respectfully greeting you. And hello
4 everybody in here.

5 Q. Good morning.

6 A. (In English) Good morning.

7 Q. Iris, I looked over my outline from yesterday, and I
8 think we hit on almost everything. But I have a few more
9 questions for you.

10 A. Yes.

11 Q. You testified yesterday that it took 15 months to pay
12 off your debt to M, is that right?

13 A. Yes.

14 Q. And based on what you know, was this a short or a long
15 time to pay off the debt?

16 A. It's very long.

17 Q. And can you tell the jury about that?

18 A. I never had experience in selling sex prior to that.

19 So when I came -- when I came here, I went to places I
20 hardly get jobs. So M sent me to Minnesota and I had to
21 stay here for a while.

22 Q. And so why did it take so long?

23 A. I hardly got customers.

24 Q. And was this the type of work you wanted to do, Iris?

25 A. No, I did not.

1 Q. And why didn't you get customers, Iris?

2 A. Can you ask me again, please?

3 Q. You answered that it took so long because you hardly got
4 any customers?

5 A. Yes.

6 Q. Why is that?

7 A. Because I had to be with new girls all of the time.

8 Customer usually pick new girls.

9 Q. You talked a lot yesterday about when you're under debt,
10 not having the choice of the customer you would see.

11 Can you tell the jury about the effect this work
12 had on your body and on your mind?

13 A. Because I had never worked like this before. While I
14 was under debt with the M or house owner sending me
15 customer, I had to took them all because I wanted to pay
16 off my debt as soon as possible.

17 Q. Was this hard work, Iris?

18 A. It was very hard for me.

19 Q. And why was it so hard?

20 A. Because I had -- I never had this kind of experience
21 before. Some customer wanted me to suck and have it
22 really deep into my throat. Some customer wanted me to
23 finish in my mouth. Some people wanted to do from
24 behind. This kind of things I couldn't do it and I
25 didn't want to do it.

1 MS. PROVINZINO: Nothing further.

2 THE COURT: Defense Counsel may inquire, if you
3 wish.

4 C R O S S - E X A M I N A T I O N

5 BY MR. SICOLI:

6 Q. Good morning, Ma'am?

7 A. Good morning.

8 Q. Now I want to first start with when you met your
9 husband, Mr. Flanigan, okay?

10 A. Yes.

11 Q. Now, if I understood the testimony, you came over here
12 in June of 2009, is that correct?

13 A. Yes.

14 Q. And you finished paying your debt in September of 2010,
15 is that correct?

16 A. Yes.

17 Q. Now near the end of when you ended up paying off your
18 debt, that's about the time you met Mr. Flanigan, is that
19 correct?

20 A. Yes.

21 Q. And did you meet him at a Thai restaurant?

22 A. At Thai restaurant, too. And also at where I worked
23 in Atlanta.

24 Q. Okay. He was a customer of yours, is that correct?

25 A. Yes.

1 Q. Now, you actually married him shortly after you met him,
2 is that correct?

3 A. We were dating for a year.

4 Q. Okay. So when did you get married then?

5 A. On the 28th of June, 2011.

6 Q. And then right after you got married, you filed in July
7 for permanent residence status, is that correct?

8 A. Yes.

9 Q. And it's literally less than a month after you married
10 him that you actually filed for permanent residence status
11 then, is that correct?

12 A. Can you repeat the question again?

13 Q. Sure. It was about a month or a little less than a
14 month after you married him that you filed for permanent
15 resident status in the United States, correct?

16 A. When I started to get married, I already -- I had
17 started filing.

18 Q. And part of the reason you got married is so that you
19 could actually file for permanent resident status, is that
20 true?

21 A. It's not true.

22 Q. All right. Well, let's talk a little bit about that.
23 Permanent resident status is something you can file when you
24 get married to somebody, is that correct?

25 A. Yes.

1 Q. And that allows you then to stay in the United States,
2 is that correct?

3 A. Yes.

4 Q. At this point in July of 2010, were you still on your
5 Visa in the United States or did that expire?

6 A. It was expired.

7 Q. So you were here illegally at that time, correct?

8 A. Yes.

9 Q. And the only way that you could stay in the United
10 States is if you married somebody and you ended up getting
11 permanent resident status, is that correct?

12 A. Yes.

13 Q. Now, on the permanent residence status application --
14 first of all, you signed this under oath, is that correct?

15 A. Yes.

16 Q. And you swear that the information that you are
17 providing is true and accurate, is that correct?

18 A. Yes.

19 Q. Just like you swore in court before you came in and
20 testified and you said, I swear to tell the truth, is that
21 correct?

22 A. Yes.

23 Q. And on the application in Paragraph 3A it actually asks
24 you within the past ten years, have you been a prostitute,
25 or procured anyone for prostitution or intend to engage in

1 such activities in the future, isn't that true?

2 A. I don't remember that question.

3 MR. SICOLI: May I approach the witness, Your
4 Honor?

5 THE COURT: You may.

6 BY MR. SICOLI:

7 Q. And if this needs to be translated, then the interpreter
8 can do that, as well.

9 Do you recognize that document? And page through
10 it if you can, just to make sure your signature is on there,
11 as well.

12 A. Yes.

13 Q. And that is the petition that you filed, is that
14 correct?

15 A. Yes.

16 Q. And if you turn to Page 3, Question 3A. And if you need
17 that translated, doesn't Question 3A ask you if you have
18 ever engaged in prostitution within the last ten years, and
19 whether you intend to engage in prostitution in the United
20 States?

21 A. At the time I answered no.

22 Q. Right. You -- and you knew that question was asking you
23 if you'd ever engaged in prostitution, and you said no, is
24 that correct?

25 A. Yes.

1 Q. And you knew that that was a lie, correct?

2 A. Yes.

3 Q. But you wanted to stay in the United States, is that
4 correct?

5 A. I wanted to remain here because I got married to my
6 husband and we both were in love.

7 Q. And you'd do almost anything to stay here because you
8 wanted to stay with your husband, is that correct?

9 A. Yes.

10 Q. And that includes lying, is that correct?

11 A. Yes.

12 Q. And also turning to Page -- it's still Page 3, Question
13 3C, it also asks you whether you entered the U.S. illegally
14 or helped then somebody enter the U.S. illegally, is that
15 correct?

16 THE INTERPRETER: The interpreter one more time?

17 MR. SICOLI: Sure.

18 A. I never had encouraged, or induced or assisted anyone
19 to come here.

20 Q. Well, you came here illegally because your application
21 for the Visa was false, isn't that correct?

22 A. It was a real Visa.

23 Q. Well, you got a Visa, but it was based upon false or
24 fraudulent information, isn't that true?

25 A. Yes.

1 Q. And for instance, you said that you had a -- that you
2 were married. And that was a fake marriage, is that
3 correct?

4 A. Yes.

5 Q. And you also said that you were coming to the United
6 States for some other reason other than prostitution, which
7 was a false answer, as well, correct?

8 A. Yes.

9 MR. SICOLI: May I approach and grab the --

10 THE COURT: You may.

11 MR. SICOLI: Thank you, Your Honor.

12 BY MR. SICOLI:

13 Q. Now, I want to go back to sort of how you ended up
14 getting into the United States in the first place.

15 I think you testified that you were working in
16 real estate for approximately 13 years, is that correct?

17 A. I was selling a housing complex.

18 Q. Sure. You were doing documents and making sure that
19 everybody had the right documents in helping sell houses, is
20 that correct?

21 A. Yes.

22 Q. And you did that until you were about 35, until the
23 2009, is that correct?

24 A. I had to work there since I was 22 until 35.

25 Q. Right. And then you decided that you needed more money,

1 correct? Because there was a problem with -- your mother
2 had to have a surgery on her heart, is that correct?

3 A. Yes.

4 Q. And you ended up getting, I think you testified that you
5 ended up using some farmland -- your family used some
6 farmland as collateral for a loan, is that correct?

7 A. Yes.

8 Q. And how much was the -- and were you able to get a loan,
9 your family?

10 A. I was not the one who received that money. It was my
11 family, my parents, who took that loan. I don't remember
12 exactly what's the number was at the time. It's been a
13 long time. And I think it was probably about 300,000 to
14 500,000 baht.

15 Q. Is that like about \$9,000 to approximately \$15,000 U.S.
16 dollars?

17 A. Yes.

18 Q. And I think you told the Government before, I don't
19 think you testified to this, but you told the Government
20 before that the reason you needed to come to the United
21 States to pay -- is to help the pay the high interest of the
22 loan. Because the loan was already gotten, so you were able
23 to pay -- the family was able to pay the medical expenses,
24 but the family couldn't pay the interest on the loan, is
25 that correct?

1 A. No, that's not true.

2 Q. So you did not have -- you did not have a problem paying
3 the interest on the loan, is that what you're saying?

4 A. It's not like -- it's not like that.

5 Q. Okay. So what were the expenses that you needed to
6 still pay, since you already got -- your family already got
7 a loan to pay the expenses?

8 A. My main purpose to come here is to making money so
9 that I could take care of my mother's sickness. And also
10 paying off that debt that they were still in debt -- in
11 debt at that time.

12 Q. And I assume there was an interest on the debt, correct?

13 A. Yes.

14 Q. Okay. And you had to pay interest on that?

15 A. Yes.

16 Q. And that was part of the debt that you wanted to pay
17 off?

18 A. Yes.

19 Q. Now, you first tried to go to Spain, but that didn't
20 work out, correct?

21 A. Yes.

22 Q. And then a Visa was completed to try to get into the
23 United States, correct?

24 A. Yes.

25 Q. And that's where on the Visa application, which is

1 Exhibit 105 -- that's where you put down the fake marriage
2 with Pradit Yooyen, is that correct?

3 A. Yes.

4 Q. Now, you told the jury that you had to -- you were told
5 to walk your passport, which was traveling to Hong Kong,
6 China, and Maucau, is that right?

7 A. Yes.

8 Q. Now, you've given a lot of statements over the year and
9 a half or so to the Government.

10 And the first time you ever mentioned about
11 walking your passport was in your November 16th, 2018,
12 statement, just a couple days ago, is that correct?

13 A. Yes. Yes. Because the Government had just asked me
14 at that time.

15 Q. Now in your statement, though, just a couple days ago.
16 You also said that you traveled to Cambodia and Vietnam, as
17 well. Didn't you tell the Government that?

18 A. Yes.

19 Q. Okay. And so you didn't testify to those two going --
20 going to those two countries, but you did go to those other
21 two countries, as well, correct?

22 A. Yes.

23 Q. And you gave a statement in December of 2016, is that
24 correct?

25 THE INTERPRETER: Can you repeat the date, again,

1 please?

2 MR. SICOLI: Sure.

3 BY MR. SICOLI:

4 Q. In December of 2016.

5 A. Yes.

6 Q. And you gave -- and I'm not going to go through every
7 one. But you gave probably, is it fair to say, at least
8 half a dozen -- at least six or seven statements to the
9 Government prior to your November 16th statement?

10 A. Can you repeat the question again?

11 Q. Sure. And, again, this is just a ballpark, but you gave
12 at least six or seven statements to the Government prior to
13 November 16th of 2018, correct?

14 A. Yes.

15 Q. And never in any of those statements did you mention
16 traveling to these other countries, is that correct?

17 A. Yes.

18 Q. Did that come up in your interview with the Government
19 because the Government asked you if you traveled to other
20 countries? Or how did that come up?

21 A. The Government had asked me.

22 Q. And remember you're under oath when you answer this
23 question, but are you saying that you did not engage in any
24 prostitution when you were in these other countries?

25 A. Yes. I never did prostitution.

1 Q. Okay. Well, let's talk a little bit about what you said
2 about the debt.

3 When you were talking to the people in Thailand,
4 you said that they told you that the debt was \$60,000 and
5 that you would be able to keep \$80 for food, is that
6 correct?

7 A. Yes.

8 Q. And I believe you testified that you traveled in June of
9 20 -- 2009 and that you divorced Pradit Yooyen before you
10 left for the United States, is that correct?

11 A. Yes.

12 Q. Isn't it true that you actually told the Government on
13 December 14th of 2016 that you actually flew to the U.S.
14 with Pradit and Tu?

15 A. September 14th, that's not correct.

16 Q. On December -- December 14th of 2016 one of the first
17 statements you gave to the Government, you actually told
18 them that Pradit Yooyen traveled with you to the United
19 States. That you found out that he was gay when you came to
20 the United States, and that you divorced him after you were
21 in the United States?

22 A. Can you repeat the question, again, please?

23 Q. Sure. And it was a compound question.

24 But isn't it true that you told the Government on
25 December 14th, 2016 -- and I can show you the Government

1 report if you want to. And you basically told them that you
2 traveled to the United States with Mr. Yooyen and Tu. And
3 that was actually confirmed by airline tickets showing that
4 that happened. Do you remember telling them that?

5 A. I remember that.

6 Q. So it isn't true that you divorced him beforehand, he
7 actually came with you to the United States, correct?

8 A. I divorced him before I came here.

9 Q. Okay. So if it's in the report that you divorced him
10 afterwards, that would be wrong?

11 MS. PROVINZINO: Objection. Mischaracterizes
12 what's in the report.

13 MR. SICOLI: Look on the next page. That's fine.

14 BY MR. SICOLI:

15 Q. Would it help you to look at the statement? Or would
16 that refresh your recollection?

17 A. Yes.

18 MR. SICOLI: May I approach, again, Your Honor?

19 THE COURT: You may.

20 BY MR. SICOLI:

21 Q. At the bottom of Page 2, and then the top of Page 3, can
22 you read that to yourself and see if that refreshes your
23 recollection?

24 A. I cannot read.

25 Q. Well, she can translate it for you.

1 A. Yes.

2 Q. Does that refresh your recollection?

3 A. I never had given that statement.

4 Q. All right. And did you say that you married Pradit for
5 the purposes of obtaining a Visa and traveling to the United
6 States?

7 A. Yes, I did.

8 Q. That you were married for two months -- or just as long
9 as it took to obtain a valid Visa into the United States?

10 A. That part I don't remember.

11 Q. Okay. Do you remember saying -- After she was married
12 she was approved for a Visa to the United States. Do you
13 remember that?

14 A. Yes.

15 Q. Do you remember saying that you flew to the U.S. with
16 Pradit and Tu?

17 A. Yes, I do.

18 Q. And then saying, Shortly thereafter Lily learned that
19 Pradit was gay?

20 A. I have learned that he was gay since I was in
21 Thailand.

22 Q. Well -- and then after you said that statement to the
23 deposit, then you say they divorced -- in other words, you
24 divorced him after you found out he was gay after you came
25 to the United States, is that correct?

1 MS. PROVINZINO: Objection.

2 THE COURT: Separate from what's in the report.
3 I'll ask the question if that's what she told the officer,
4 or whoever interviewed her.

5 BY MR. SICOLI:

6 Q. Is that what you told the officer?

7 A. I divorced him before I came to the U.S.

8 Q. But you came to the U.S. then?

9 A. Yes.

10 Q. If you divorced him, why did you come to the U.S. with
11 him?

12 A. To enter the United States easily.

13 Q. All right. Let's go on then. You testified that there
14 was a \$60,000 debt, is that correct?

15 A. Yes.

16 Q. And when you -- isn't it true that when you got to the
17 U.S. and you met with M that she reduced debt to \$55,000
18 from \$60,000, isn't that correct?

19 A. After I had been paying off my debt for \$50,000, then
20 she notified me she was reducing the debt to \$55,000.

21 Q. In September 24th of 2018, in a statement to the
22 Government, did you tell the Government that after you
23 entered the U.S. you were told by M, after you met with her,
24 that your debt would be reduced to \$55,000?

25 A. At first she didn't tell me that until I was paying

1 my off -- that I was almost done. Then she told me that
2 she would reduce the debt.

3 Q. All right. So either way it goes though, the debt was
4 not \$60,000, it was \$55,000, is that correct?

5 A. I paid off my debt \$55,000.

6 Q. Now, when you got to the United States, you went to San
7 Francisco first, is that correct?

8 A. Yes.

9 Q. And you weren't very good at doing sex work, is that
10 correct?

11 A. Yes.

12 Q. And I just want to make sure we clear this up, because
13 it's a little bit confusing.

14 But you said that you had to take all the
15 customers that were given to you and that there were a lot
16 of customers. But you've also testified that you weren't
17 getting customers because you weren't any good. Which one
18 is it?

19 A. Yes. I had to take on all the customer who were sent
20 to me.

21 Q. Right. It sounds, though, like there wasn't that many
22 that were sent to you, at least initially, because you
23 weren't very good at it, was your testimony, is that
24 correct?

25 A. Yes.

1 Q. And at that point in time, no one forced you to take on
2 other clients. They were fine with the fact that you
3 weren't getting a lot of customers, isn't that true?

4 A. Yes.

5 Q. And then you ended up -- eventually after you stopped
6 off at Chicago and went other places, you ended up working
7 at Maya's house Orange County, is that correct?

8 A. No, it wasn't.

9 Q. Well, at some point in time you worked at Maya's house
10 in Orange County, is that right?

11 A. Yes.

12 Q. And it was only for 15 days, is that correct?

13 A. Yes.

14 Q. And you mentioned that Maya had mentioned to you that
15 you could make more money to pay off your debt if you did
16 some extras, like having a blow job without condom, that
17 kind of thing, is that correct?

18 A. Yes.

19 Q. And you were free to say, I don't want to do those
20 things, even though I would get more money, correct?

21 A. Can you repeat again, please?

22 Q. Sure. You were free to say, No, I don't want to do
23 that. I won't make more money. I just won't do that kind
24 of stuff. You were free to do that, right?

25 A. Yes.

1 Q. And, in fact, you did say, No. I'm not going to do
2 that, right?

3 A. Yes.

4 Q. And you were also free to go out when you were in
5 California? If you wanted to go to the store, you were free
6 to do that, correct?

7 A. Yes.

8 Q. And how were?what were the hours that you had to be
9 available to work at that time?

10 A. At Maya's house, I don't really remember the timing,
11 the working time. Because it had been eight to nine
12 years. I can't really recall, I'm sorry.

13 Q. Sure. And the average time, sometimes you'd have a
14 span -- would it be fair to say at a lot of houses would it
15 be at 9:00 -- 9:00 in the morning to 9:00 in the evening or
16 10:00 in the evening? Would that be fair?

17 A. I don't think that Maya's house opened that early.
18 While I was there, it was probably sometimes between
19 10:00 to 10:30.

20 Q. 10:00 to 10:30 in the morning it would open up?

21 A. It's 10:00 to 10:30 in the morning. I don't remember
22 the exact work hours.

23 Q. And I assume even if it's 10:00 to 10:30, it doesn't
24 mean you're working all those hours, correct?

25 A. Can you repeat one more time?

1 Q. Sure. Let's say -- let's use the hours of 10:00 in the
2 morning until 10:00 in the evening.

3 If you're available for those hours, that doesn't
4 mean you're working with customers every hour of that time
5 period, is that correct?

6 A. Yes.

7 Q. I'm correct in that, right?

8 A. Yes.

9 Q. All right. Now I believe you testified that you -- when
10 you were at Maya's house, you only met Uncle Bill one time,
11 is that correct?

12 A. Yes.

13 Q. And he was very kind to you, is that correct?

14 A. Yes.

15 Q. He cooked you up a steak, is that correct?

16 A. Yes.

17 Q. Okay. And I assume the steak was good, you liked it?

18 A. I liked it a lot. That was the first time that I
19 ever had such steak, as far as I remember.

20 Q. Okay. And he did that with -- he didn't get any money
21 for that, obviously. He did that to help you, is that
22 correct?

23 A. Yes.

24 Q. And then he also took you out shopping, I think you said
25 in his convertible, to help you buy makeup?

1 A. Yes.

2 Q. And then you also kept some of the money that you earned
3 from prostitution. It didn't all go to M, is that correct?

4 A. That's not correct.

5 Q. Well, you originally testified that you got to keep \$80
6 for sure, right?

7 A. That is what M has to pay for my food per week.

8 Q. And you also, though, you were the person that decided
9 what money was going to go back to M, though. I mean, it
10 wasn't any of the people that ran the houses, is that
11 correct?

12 A. Yes.

13 Q. Now, you've testified to this jury that you really
14 didn't want to do the work. That it was something that you
15 didn't want to do, is that correct?

16 A. Yes.

17 Q. But you continued to work after you paid off the debt in
18 September of 2010, correct?

19 A. Yes.

20 Q. And that was because you were earning a lot of money, is
21 that correct?

22 A. If it compared with other people, I only made a
23 little.

24 Q. Well, you made more than you ever could make in
25 Thailand, is that correct?

1 A. Yes.

2 Q. And you were sending money back to your family in
3 Thailand, is that correct?

4 A. Yes.

5 Q. And I want to -- this is the picture, it's Exhibit 1012.
6 It's already been admitted.

7 THE COURT: For the record, not to interrupt, I'm
8 going to go down to the other light setting, too. Not to
9 emphasize one exhibit, but as we put it down for all the use
10 of the screen here.

11 Go ahead, Mr. Sicoli, continue.

12 MR. SICOLI: Thank you, Your Honor.

13 BY MR. SICOLI:

14 Q. So this picture was taken in Minnesota, is that correct?

15 A. Yes.

16 Q. And this was actually in 2013, is that correct?

17 A. I had said that it was approximately between 2012 or
18 to 2013, I can't recall exactly.

19 Q. So this was a picture that was taken when you were
20 already off of debt, is that correct?

21 A. Yes.

22 Q. And I think you identified this person as -- as M, is
23 that correct?

24 A. Yes.

25 Q. So you were still doing work in Minnesota with M, is

1 that correct? At that time?

2 A. Yes.

3 Q. And showing you what's already been admitted as
4 Exhibit 1200, this is an ad that was actually placed in --
5 and that's you, correct?

6 A. Yes.

7 Q. And this is an ad that was placed in 2014, is that
8 correct?

9 A. Correct.

10 Q. And, again, you're not on debt, is that correct?

11 A. Yes.

12 Q. And you're seeing customers, correct?

13 A. Yes.

14 Q. And still showing you a part of that exhibit, it says
15 that the time that you're open is 9:00 a.m. to 11:00, is
16 that correct?

17 A. Yes.

18 Q. So you're working on your own now, even though you're
19 going through M to sort of advertise, and you're advertising
20 that you're available from 9:00 a.m. to 11:00 p.m., is that
21 correct?

22 A. I didn't work fully for me, because I had to come and
23 work at M as a working women and paying her house -- the
24 house fee.

25 Q. Right. But you were off of debt, correct?

1 A. Yes.

2 Q. So you could choose where you wanted to go, correct?

3 A. Yes.

4 Q. You could choose your working hours, correct?

5 A. Yes.

6 Q. And you still chose to come to Minnesota to work with M
7 at her house, is that correct?

8 A. Yes.

9 Q. And you chose the hours of 9:00 to 11:00 -- 9:00 a.m. to
10 11:00 p.m. as hours you would be available, correct?

11 A. Yes.

12 Q. And remember, this is a job you told the jurors you hate
13 to do, right?

14 A. Yes.

15 Q. But you're continuing to do it voluntarily, is that
16 correct?

17 A. Yes.

18 Q. Now -- and the reason, again, is because you're making
19 money and you want to support your family and help them, is
20 that correct?

21 A. Yes.

22 Q. Now, so you pay off the debt to M in 2010. You actually
23 work as a prostitute all the way, in essence, through 2016
24 when you're arrested, is that correct?

25 A. Yes.

1 Q. So that's about six years, is that correct?

2 A. Yes.

3 Q. And from 2012 to 2014, you actually paid off all of your
4 -- the family debt, of your family in Thailand, is that
5 correct?

6 A. My family's debt actually was paid off in 2013.

7 Q. All right. So -- and do you remember how much money you
8 sent back to pay off the debt?

9 A. I don't remember because there was not only the money
10 that I had -- I had to pay back to the bank for putting
11 the lending to them, but there was the debt outside of
12 loan system, as well.

13 Q. Outside of what? I didn't understand the last part.

14 A. The loan system.

15 Q. The load system?

16 A. Loan system.

17 Q. Loan system. Okay. So there was some other family debt
18 that you needed to pay?

19 A. Yes.

20 Q. And so you paid that off, in essence, in two-and-a-half
21 years, approximately?

22 A. Yes.

23 Q. And that was all from prostitution earnings, is that
24 correct?

25 A. Yes.

1 Q. Now, in addition to that, though, you also bought a
2 house in Thailand for your family, is that correct?

3 A. Yes.

4 Q. And the cost for that house was \$50,000 U.S. dollars, is
5 that correct?

6 A. In Thai money it was about 1,700,000 baht. I'm not
7 sure how much that is in U.S. dollars.

8 Q. All right. So let's say if it's 1 million baht, is that
9 \$30,000 in U.S. dollars?

10 A. Yes.

11 Q. And so, in addition to paying off all of the debt, you
12 were also able to pay \$30,000 from prostitution earnings to
13 buy a house in Thailand?

14 A. Yes.

15 Q. And your sister actually lives in that house, is that
16 correct?

17 A. Yes. My whole family.

18 Q. Okay. So you've been supporting -- you've done a good
19 job for your family, you've supported them?

20 A. Yes.

21 Q. And it's all from the prostitution earnings?

22 A. Yes.

23 Q. Now, in addition to that, didn't you buy your family
24 also a rice farm in Thailand?

25 A. Yes.

1 Q. And the cost for that was also another 30,000 in U.S.
2 dollars, approximately, isn't that correct?

3 A. Yes.

4 Q. And that came from prostitution -- the majority of that
5 came from prostitution earnings, is that correct?

6 A. Yes.

7 Q. So if there's -- paying off the debt, do you know if the
8 debt that you paid off was more than 10,000 U.S. dollars or
9 do you have a ballpark figure?

10 A. I don't remember the exact number, but I know it was
11 a lot of money in Thai baht.

12 Q. So we know, though, that you have approximately 30,000
13 in U.S. dollars for the house, correct?

14 A. Yes.

15 Q. And another 30,000 for the rice farm?

16 A. Yes.

17 Q. And so that's 60,000 just from those two, is that
18 correct?

19 A. Yes.

20 Q. And does that rice farm helping your family continue to
21 earn money? Because of the rice farm?

22 A. Yes. We used that rice farm to grow rice for our own
23 consumption.

24 Q. So it helps with feeding the family?

25 A. Yes.

1 Q. Okay. And how many people are supported by that rice
2 farm, as far as feeding the family?

3 A. There are my younger sister, my father, my brother,
4 my nieces and nephew, four of them, and also my sister's
5 husband.

6 Q. So you support a lot people or help support a lot of
7 people in Thailand?

8 A. Yes. All of the -- all of them in my family.

9 Q. Now, in addition to sending that money back, I assume --
10 did you have someplace that you were living when you were in
11 the United States after you were off of debt?

12 A. I did.

13 Q. Okay. And so did you rent an apartment or what did you
14 do?

15 A. I stayed at my husband's house.

16 Q. All right. And did he own that? Or did you guys have
17 rent on that? Or what did you have?

18 A. My husband owned that house.

19 Q. And did you have other expenses you had to pay like
20 food?

21 A. Where did you mean?

22 Q. When you were in the United States, when you were off
23 the debt, did you have other expenses that you had to cover?

24 A. Yes. There are -- there were.

25 Q. Okay. And some of those expenses, at least -- I know

1 you had your husband, as well, but some of those expenses
2 were covered by prostitution earnings, is that correct?

3 A. My husband did not take my prostitution money to use
4 as expense.

5 Q. So you're saying you didn't use any of the prostitution
6 money for your own expenses?

7 A. I send that money back to my family and I save some
8 for my personal use. But as far as the household
9 expenses, he did not take this money to spend.

10 Q. So you saved some money, as well, correct?

11 A. A little bit.

12 Q. Okay. How much? Did you put it in a bank? What did
13 you do with it with it?

14 A. It was in the bank in Thailand.

15 Q. Do you remember how much?

16 A. About 35 -- hold on. 350,000 baht.

17 Q. So that's somewhere around 10,000? I might get that
18 wrong. How much is that in U.S. dollars, would you say?

19 A. It's probably not more than 15,000 U.S. dollars.

20 Q. Okay. Now when you would actually be off of debt and you
21 ended up working, like for M in Minnesota, where did you
22 stay in Minnesota?

23 A. At the hotel. There were -- there were also
24 apartments sometime.

25 Q. Okay. So when you -- did you stay where you were doing

1 the sex acts? Or did you stay someplace separate when you
2 were doing that?

3 A. It was the same place that I used as working.

4 Q. All right. So -- and even when you were off of debt,
5 when you're doing your work, you would actually sleep in the
6 same place that you had sex with customers?

7 A. Yes.

8 Q. And that obviously didn't present any problems for you,
9 right?

10 A. Yes.

11 Q. I'm correct in that, right?

12 A. Yes. It's not the problem.

13 Q. Just so we understand from a summary standpoint, so you
14 -- you engaged in prostitution because you wanted to come to
15 the United States, correct?

16 A. Yes.

17 Q. You performed what we would probably call normal sex
18 acts like intercourse and blow jobs with condom, correct?

19 A. Yes.

20 Q. You refused to do any extras that could give you more
21 money, correct?

22 A. There was one thing that I could perform for extra,
23 that is a blow job without condoms.

24 Q. And you would do that sometimes so that you could make
25 more money?

1 A. Yes.

2 Q. Then you paid the debt in 15 months, correct?

3 A. Yes.

4 Q. But you continued to engage in prostitution for another
5 six years, is that correct?

6 A. Yes.

7 Q. You bought a house in Thailand for your family for
8 30,000?

9 A. Yes.

10 Q. And a rice farm for another 30,000, correct?

11 A. Yes.

12 Q. Now you have actually told other people -- or told
13 people before that if you knew that you could make that much
14 money in the United States with prostitution you would have
15 come earlier, haven't you said that?

16 A. Yes.

17 Q. Because it's a lot of money?

18 A. Yes.

19 Q. Now, I want to -- the last thing, and I spent a lot of
20 time with you, but the last thing I want to talk to you
21 about is your plea agreement. If I could just for a moment.
22 Okay?

23 A. What's plea -- what's plea agreement?

24 Q. Well, you entered an agreement with the Government to
25 plead guilty in this case, is that correct?

1 A. Yes.

2 Q. And thanks for letting me know you didn't understand.
3 Sometimes lawyers talk in lawyer's speak, so if you don't
4 understand just let me know, okay?

5 A. Yes. Yes, thank you.

6 Q. All right. So, under the plea agreement with the
7 Government, you pled guilty to conspiracy to commit sex
8 trafficking, is that correct?

9 A. Yes.

10 Q. And that's by force, fraud or coercion, is that correct?

11 A. Nobody forced me.

12 Q. Nobody forced you to engage in prostitution, is that
13 correct?

14 A. No. There's nobody.

15 Q. You did it on your own free will, correct?

16 A. Yes.

17 Q. And you certainly never forced anybody to engage in
18 prostitution, is that correct?

19 A. Yes.

20 Q. And you never coerced anybody into prostitution, is that
21 correct?

22 A. I never did that.

23 Q. And you never agreed with anybody to do that, correct?

24 A. Sorry. Can you repeat one more time?

25 Q. You never agreed with anybody to be part of a conspiracy

1 to traffic women by force, fraud or coercion?

2 A. Yes.

3 Q. And in addition to pleading guilty to conspiracy to sex
4 trafficking, you also pled guilty to money laundering, is
5 that correct?

6 A. Yes.

7 Q. And under the plea agreement, you know that you're
8 looking at possibly 292 months to 365 months in prison. Do
9 you understand that?

10 A. I understand.

11 Q. And so that's -- that's almost 25 years to 30 years, is
12 that correct?

13 A. Yes.

14 Q. But you have an agreement with the Government that if
15 you cooperate with the people at this table, and the
16 prosecution of the people at this table, that the Government
17 then will make determination that they would ask the Court
18 for a motion for downward departure based upon your
19 substantial assistance to the Government, is that correct?

20 A. The Government did not offer me anything.

21 Q. Well, the Government hasn't made any promises to you, is
22 that correct?

23 A. No.

24 Q. But the Government has told you, when you've entered
25 into a cooperation agreement with the Government, that if

1 the Government feels that you assisted them in the
2 investigation and the prosecution, that the Government will
3 decide whether they will make a motion to get you below the
4 292 to 365 months, is that correct?

5 A. The Government did not notify me anything. Did not
6 offer me anything.

7 Q. Well, you -- you signed a plea agreement with the
8 Government, correct?

9 A. Yes.

10 Q. And you were respected by attorney Steven Wolter, is
11 that correct?

12 A. Yes.

13 Q. And then you also signed what's called a Cooperation
14 Agreement saying that you would cooperate with the
15 Government in the prosecution, is that correct?

16 A. Yes.

17 Q. And under the Cooperation Agreement, you agreed to talk
18 to the Government and tell them what you know, correct?

19 A. Yes.

20 Q. And if you continue to cooperate with the Government,
21 and you render what the Government determines to be
22 substantial assistance to the Government, then the
23 Government will move for a downward departure from the
24 guidelines. Isn't that what the agreement says?

25 A. This I don't know anything. This is -- depends on

1 the Government.

2 I have given my cooperations based on my desire to
3 speak the truth to everybody here in this court, and to
4 Judge Frank and to the jury to hear the truth.

5 Q. And how old are you now?

6 A. 44 year old.

7 Q. And so if you've got 25 to 30 years, that would be -- in
8 prison, that would be most of the rest of your life, is that
9 correct?

10 A. Yes.

11 Q. And you want to get back to your family in Thailand, is
12 that correct?

13 A. Yes.

14 Q. And you also want to be with your husband, is that
15 correct?

16 A. Yes.

17 Q. And you know under the agreement that the only way you
18 can get less than that is if you cooperate with the
19 Government, is that correct?

20 A. I had said earlier that the Government did not offer
21 me anything. I just wanted to speak the truth without
22 hiding anything back.

23 Q. Well, let's put it this way. You're hoping you get a
24 sentence much lower than 292 months, isn't that correct?

25 A. Yes.

1 Q. And you're hoping that what you're doing today and what
2 you did yesterday will help you get that sentence lower than
3 292 months, correct?

4 A. Yes.

5 MR. SICOLI: Thank you. I have no further
6 questions.

7 THE COURT: I think we'll take our morning recess
8 here, Counsel.

9 We'll take 15 minutes, unless the Marshal service
10 needs a bit more. Rise for the jury, please.

11 (Jurors excused at 10:47 a.m.)

12 (In open court at 11:04 a.m.)

13 THE COURT: As soon as the jury is ready Defense
14 Counsel can inquire if they wish.

15 C R O S S - E X A M I N A T I O N

16 BY MR. ENGH:

17 Q. Good morning.

18 A. Good morning.

19 Q. I want to ask you some questions about Austin, Texas and
20 your visit there in July of 2015.

21 A. Yes.

22 Q. That was the first and last time you had been to Austin?

23 A. Yes.

24 Q. You had found out about Austin through your friend Anna?

25 A. Yes.

1 Q. She told you about what a nice place it was?

2 A. Yes.

3 Q. She suggested you go there?

4 A. Yes.

5 Q. She knew Ms. Thinram, as far as you know?

6 A. Yes.

7 Q. She, meaning Anna, had been there before?

8 A. Yes.

9 Q. And by this time in your journey here in the United
10 States, you had paid your debt?

11 A. Sorry. Can you repeat your question, again?

12 Q. By 2015, when you went to Austin, you had your debt
13 paid?

14 A. Yes.

15 Q. Okay. By the way, did you have a separate agreement
16 with M where you would share 50 percent of what you earned
17 with her over time?

18 A. No, there was not.

19 Q. There is no such agreement that you split 50/50 the
20 proceeds that you earned from prostitution with M while you
21 were under her debt?

22 A. No, there was not.

23 Q. In any event, you made plans to go to Austin, Texas and
24 flew in, right?

25 A. Yes.

1 Q. And when you arrived, you had no fear of Ms. Thinram
2 whatsoever?

3 A. No.

4 Q. Nor of her husband Gregg?

5 A. No.

6 Q. I take it you would not have gone there had you been
7 fearful?

8 A. Yes.

9 Q. So it was your decision to go to Austin?

10 A. Yes.

11 Q. No one made you do it?

12 A. No.

13 Q. Okay. No one coerced you into going?

14 A. No.

15 Q. You arrived at the airport and were met by someone?

16 A. Yes.

17 Q. That was Gregg, her husband?

18 A. Yes.

19 Q. You had not met him before?

20 A. No.

21 Q. Okay. He greeted you at the airport and was polite to
22 you?

23 A. Yes.

24 Q. And your original plan was to stay three or four days?

25 A. I didn't plan to be there for three to four days, but

1 I was able to be there for three to four days.

2 Q. And eventually you weren't there very long at all?

3 A. Yes.

4 Q. And no one made you stay longer than you wanted to?

5 A. Yes.

6 Q. And you mentioned yesterday when you left that Ms.

7 Thinram was quite nice about it, really nice about it, is
8 that right?

9 A. Yes.

10 Q. While you were at the apartment in Austin, you saw Mr.
11 Kimmy around, did you not?

12 A. I don't know who Kimmy is.

13 Q. Gregg. I tell you his name is Gregg Kimmy, I'll call
14 him Gregg for our purposes. Fair enough?

15 A. Okay.

16 Q. Now while you were there, Gregg was at the apartment or
17 nearby, is that right?

18 A. Yes.

19 Q. And you understood that Gregg and Ms. Thinram are
20 married?

21 A. Yes.

22 Q. And it's a legitimate marriage?

23 A. Yes.

24 Q. They loved each other?

25 A. Yes.

1 Q. And while you were there, Gregg took you shopping, as I
2 understand it?

3 A. Yes. We went to buy food.

4 Q. And you indicated that was the first day you were there?

5 A. I don't remember whether it was on the second day or
6 third day that we went to buy food.

7 Q. Okay. You asked him for food and he helped you get
8 some?

9 A. There was a lot of food at home but they wanted to
10 have more food. So that's when he took me to buy more
11 food.

12 Q. Did you ask him or did he suggest you go?

13 A. He took me himself.

14 Q. Okay. What happened in Austin is that you arrived and
15 you had several customers?

16 A. The first day when I got there I didn't work. I
17 worked the next day. And I had all seven -- I had
18 customer, all of them seven people.

19 Q. Okay. And those had been lined up by Gregg, is that
20 right?

21 A. Yes.

22 Q. Okay. One of the customers was difficult, as I
23 understand it?

24 A. He was nice. But I felt like he was not normal.

25 Q. All right. And this was -- this was the customer with

1 the oil in the bathtub, am I right about that?

2 A. Yes.

3 Q. In the course of your career, you've had other difficult
4 customers, I assume?

5 A. Yes.

6 Q. Okay. And you can't always predict which ones will be
7 difficult and which ones will be really nice?

8 A. Yes.

9 Q. What happened here is that he asked you to do something
10 in the bathtub and you declined?

11 A. So what happened was I had done -- I had given him a
12 blow job and he wanted to be putting me in the bathtub
13 with the oil on me, but I felt like that was not safe.
14 So I asked him to go to the bed instead.

15 Q. And what's happened. You had sex on the bed then, is
16 that correct?

17 A. Yes.

18 Q. Then what occurred is he wrote a bad review for you?

19 A. That's what the house owner notified me.

20 Q. Okay. And you had no evidence that Gregg wrote a bad
21 review for you, obviously?

22 A. No.

23 Q. And there was mention in the bad review that you had
24 stretch marks when you had none, is that right?

25 A. That's what -- what's what the house owner notified

1 me of how the review was written, but I didn't really
2 have the stretch marks.

3 Q. Okay. You never read the review, I take it?

4 A. I never did.

5 Q. It's just what Gregg said the review said to you, is
6 that right?

7 A. Yes.

8 Q. Then Gregg made an effort to correct the review by
9 asking for photographs so that you could refute the stretch
10 mark accusation, is that right?

11 A. Yes.

12 Q. Okay. And you didn't want Gregg to take the pictures,
13 so someone else at the house wound up taking the pictures to
14 show you didn't have stretch marks, is that right?

15 A. Yes.

16 Q. Okay. And Gregg was fine with having someone else take
17 the pictures, is that right?

18 A. Yes.

19 Q. Okay. Do you know if those pictures were posted or not?

20 A. I don't know.

21 Q. But what occurred is that after that review was posted,
22 no customer wanted to hire you personally, for as unfair as
23 that may have been?

24 A. Yes.

25 Q. And you realized at that point that you would have to go

1 or leave?

2 A. Yes.

3 Q. And you left voluntarily?

4 A. Yes.

5 Q. No one controlled your movement?

6 A. No.

7 Q. You told Gregg that you were going to fly out and leave
8 and he didn't talk you out of it, is that right?

9 A. Yes.

10 Q. And no one -- no one in Austin ever made you do ten
11 customers a day?

12 A. No.

13 Q. Okay. Or day after day with ten people?

14 A. I only had customer for the first day that I was
15 there. I would never able to take customer -- ten
16 customer a day.

17 Q. And no one cheated you in Austin out of what you
18 deserved and out of what you earned?

19 A. Nobody.

20 Q. No one took your passport?

21 A. Nobody.

22 Q. Okay. No one forced you to be there?

23 A. No one did.

24 Q. You were a willing participant?

25 A. Yes.

1 Q. Is your testimony that you saw Nancy or Ms. Thinram that
2 last day before you left?

3 A. No. I never saw Nancy in Austin.

4 Q. Okay. Did you see Anna in Austin either?

5 A. No, I did not.

6 Q. Let me show you Exhibit 203(sic). Can you see 302?

7 A. Yes, I do.

8 Q. There's an e-mail in the middle of the page from Nancy
9 Sweet do you see that?

10 A. Yes, I do.

11 Q. And do you understand that that's dated 2009? It looks
12 like July 14th, 2009. Do you see that?

13 A. Yes, I do.

14 Q. And that the address for the e-mail is
15 sexysweetnancy@googlemail.com, do you see that?

16 A. Yes.

17 Q. Is it your testimony or was it your testimony yesterday
18 that Ms. Thinram sent that e-mail?

19 A. It was not this e-mail.

20 Q. Do you know when Ms. Thinram ever came -- or came to the
21 United States?

22 A. I do not know.

23 Q. Do you know whether this e-mail that's attributable to
24 her was sent before she ever arrived here?

25 MS. PROVINZINO: Objection. There's no

1 attributions. I think the witness already identified that
2 it was --

3 MR. ENGH: Object to the narrative objection, too.

4 THE COURT: I'll just ask that you rephrase it.

5 BY MR. ENGH:

6 Q. Well, are you aware that Ms. Thinram arrived after this
7 e-mail was sent in 2011 or 2012, long after this e-mail was
8 sent?

9 A. I do not know that.

10 Q. Okay.

11 MR. ENGH: No further questions. Thank you.

12 THE COURT: Additional Defense Counsel may inquire
13 if you wish.

14 C R O S S - E X A M I N A T I O N

15 BY MR. GUERRERO:

16 Q. Good morning, Ms. Boonluea.

17 A. Good morning.

18 Q. I just have a real brief inquiry. You were an
19 independent working girl for close to six years?

20 A. Yes.

21 Q. Was it a common practice for independent working girls
22 to talk amongst each other to -- as to where they might go?
23 Different houses to go to?

24 A. Yes.

25 Q. Certain houses had better reputation than others?

1 A. Yes.

2 Q. And it's important for you to feel safe where you're
3 going?

4 A. Yes.

5 Q. And you knew that certain people that had apartments
6 would do a better job of keeping that place safe?

7 A. Yes.

8 Q. Sometimes they'd do a better job like screening clients?

9 A. Yes.

10 Q. And would you tell the person who had the apartment if
11 you didn't like somebody? Bad customer?

12 A. Yes.

13 Q. And would there be some people that would make sure that
14 that customer didn't come back?

15 A. Yes.

16 Q. All right. Thank you, Ms. Boonluea?

17 A. Thank you.

18 THE COURT: Mr. Gerdts?

19 C R O S S - E X A M I N A T I O N

20 BY MR. GERDTS:

21 Q. Good morning.

22 A. Good morning.

23 Q. My name is Daniel Gerdts. I represent Ms. Unpradit.

24 A. Yes.

25 Q. You had never met Ms. Unpradit before you were arrested,

1 correct?

2 A. No. I had never met her.

3 Q. You testified that your family had some debt that was
4 outside of the loan system. Do you remember that?

5 A. Yes, I do.

6 Q. And by that you mean that it was not a loan from a bank,
7 is that correct?

8 A. It's separated from the banking.

9 Q. So it's not from a bank, correct?

10 A. That's correct.

11 Q. Your family had already taken a loan from a bank, true?

12 A. Yes.

13 Q. And they had already pledged their property as
14 collateral, right?

15 A. Yes.

16 Q. So they got additional money from somebody else, is that
17 correct?

18 A. Yes.

19 Q. And could you just explain to the jury the arrangements
20 for how that loan worked?

21 A. Did you mean the -- the banking loan? Or the loans
22 outside the system?

23 Q. The loan that was outside of the banking system?

24 A. So it was my either my family or I would borrow money
25 from a person who loaned money to general population.

1 The interest would be 10 percent or 20 percent sometimes.

2 Q. Sometimes the interest would be very high, right?

3 A. Yes, very high.

4 Q. But if you're a relatively poor person in Thailand,
5 sometimes that's the only way you can get credit, correct?

6 A. Yes.

7 MR. GERDTS: Thank you, Your Honor.

8 THE WITNESS: Thank you.

9 THE COURT: Mr. Rivers?

10 MR. RIVERS: No questions.

11 THE COURT: Redirect, if Counsel wishes.

12 R E D I R E C T E X A M I N A T I O N

13 BY MS. PROVINZINO:

14 Q. All right. So you were asked a couple guess about
15 Kung's home in Austin. Do you remember those?

16 A. Yes, I do.

17 Q. And at that point you were done with your debt, is that
18 right?

19 A. Yes.

20 Q. So at that point you could choose when you would work,
21 is that right?

22 A. Yes.

23 Q. So you were free to go there and work in prostitution if
24 you wanted?

25 MR. GUERRERO: Objection as to the form.

1 THE COURT: Sustain as to the form.

2 BY MS. PROVINZINO:

3 Q. So you couldn't make that choice if you wanted to go to
4 Austin or not, is that true?

5 A. Yes.

6 Q. But what about before when you were under debt? Could
7 you choose where you worked?

8 A. I could not.

9 Q. When you were under debt, were you free to walk away
10 from it?

11 A. No, I could not.

12 Q. Defense Counsel asked you about Kung's e-mail. And I'm
13 showing you Government Exhibit 277 from yesterday.

14 A. Yes.

15 Q. Do you see that in front of you?

16 A. Yes, I do.

17 Q. And that would an e-mail sent from you, pet1138, is that
18 right?

19 A. Yes.

20 Q. And who did you send that e-mail to?

21 A. Sexynancyaustin@gmail.com is Kung.

22 Q. Bless you. Now you were asked lots and lots of
23 questions about your fake marriage in Thailand, is that
24 right?

25 A. Yes.

1 Q. And that was to Pradit Yooyen?

2 A. Yes.

3 Q. And do you remember the date of your divorce?

4 A. I do not.

5 MS. PROVINZINO: May I approach, Your Honor --

6 THE COURT: You may.

7 MS. PROVINZINO: -- to refresh her recollection?

8 BY MS. PROVINZINO:

9 Q. And I'm showing you a registration of divorce, which has
10 been translated, certified translation from the Thai to the
11 English.

12 A. Yes.

13 Q. And there's a listed date of the marriage?

14 A. Yes.

15 Q. And that was -- do you see the date?

16 A. Yes, I do.

17 Q. And there was a date of divorce?

18 A. Yes, I do.

19 Q. And does this refresh your recollection as to the date
20 of the divorce?

21 A. Yes.

22 Q. So Iris, when did you enter into this fake marriage?

23 A. It was in June, 2009.

24 Q. Okay. And that's the actual date you divorced, is that
25 right?

1 A. The divorce day was June -- the 9th of June 2009.

2 Q. And when did you enter the United States?

3 A. On the 16th of June, 2009.

4 Q. So that was the divorce, is that right?

5 A. Yes.

6 Q. Now Defense Counsel asked you about the money you made
7 from being part of this organization. Do you remember those
8 questions?

9 A. Yes, I do.

10 Q. And that was money from the commercial sex?

11 A. Yes.

12 Q. And at some point, Iris, you told the jury that you
13 became a house boss in Atlanta, right?

14 A. Yes.

15 Q. And as a house boss in the sex trafficking organization,
16 you made a lot of money, fair?

17 A. I didn't make much money.

18 Q. Well, you made a lot more money than you would have made
19 in Thailand, is that right?

20 A. Yes.

21 Q. And that was the point of why people belonged to this
22 conspiracy?

23 A. Yes.

24 Q. And you knew what you did was wrong?

25 A. Yes.

1 Q. And because of that, you were charged and you pled
2 guilty to it, right, to being involved in the sex
3 trafficking conspiracy?

4 MR. GUERRERO: Again, Your Honor.

5 THE COURT: I'll sustain as to the form.

6 BY MS. PROVINZINO:

7 Q. Well, did you plead guilty to being part of the sex
8 trafficking conspiracy?

9 MR. ENGH: This is still leading. I still object.

10 THE COURT: I request a more open-ended question.

11 BY MS. PROVINZINO:

12 Q. And what you plead guilty to, Iris?

13 A. Sex trafficking and money laundering.

14 Q. And as a result of those charges, do you understand you
15 could be facing a lot of prison time?

16 A. Yes.

17 Q. And your husband, too, is that right?

18 A. Yes.

19 Q. Iris, you mentioned that you never had steak before
20 Uncle Bill provided steak to you.

21 A. Yes.

22 Q. Can you tell the jury a little bit about the poverty
23 your family experienced in Thailand?

24 A. (In English) Sorry. (Through Interpreter) I
25 remember since I was born my family was poor. (In

1 English) Okay. I'm sorry.

2 (Through Interpreter) I remember that my
3 family was very poor. My family sometimes didn't have
4 money to buy food. But the way that we were able to
5 live, because we were living in the provinces -- in other
6 province, we would collect and forage vegetable, fry
7 fish, crab and we would also grow our own rice.

8 Q. Now, Bill's Counsel asked you whether he got any money
9 from providing you that steak meal, is that right?

10 THE INTERPRETER: I'm sorry. Could you repeat
11 that?

12 BY MS. PROVINZINO:

13 Q. Bill's Counsel asked you if he got any money for
14 providing that steak meal, is that right?

15 A. No, he didn't.

16 Q. And he said that Bill just did that to help you. Do you
17 remember that question?

18 A. Yes.

19 Q. But was Uncle Bill just some random stranger who stopped
20 by that house of prostitution?

21 A. Yes, he was.

22 Q. And so he was there to provide -- was he there with
23 Maya?

24 A. When he went there, there was no P'Maya with him.
25 Just Uncle Bill himself.

1 Q. So Bill was there without Maya, is that right?

2 A. No. There was -- she was not there.

3 Q. And you talked about a time he took you to the store, is
4 that right?

5 A. Yes.

6 Q. And why did he take you to the store?

7 A. I wanted to buy cosmetics.

8 Q. And what were the cosmetics for, Iris?

9 A. To use for working.

10 Q. And when you say to use for working, can you explain
11 that for the jury?

12 A. I wanted to buy powder, lipstick or perfume to make
13 me look better so that I could work as selling sex.

14 Q. And Bill knew that's what you were buying it for, is
15 that right?

16 A. Yes, he knew.

17 Q. And when you were working in Orange County, could you
18 have just gone to the store on your own?

19 A. No, I could not.

20 Q. You had to get permission or someone to take you, is
21 that true?

22 MR. SICOLI: Objection. Leading.

23 THE COURT: Sustain as to the form.

24 BY MS. PROVINZINO:

25 Q. Why couldn't you just go to the store on your own?

1 A. Because I never -- I didn't know where it was, and I
2 didn't speak English and so I didn't know where to go.

3 Q. And so that was another way that Uncle Bill helped you,
4 is that right?

5 A. Yes.

6 Q. Now, Iris, you've talked about the working relationship.
7 Can you tell -- describe for the jury if there was any
8 partnership and anything that happened to break up the
9 relationship between Uncle Bill and Maya?

10 MR. SICOLI: Objection, Your Honor. There's never
11 been any testimony about a partnership between them with
12 this witness.

13 THE COURT: Well, as long as she has firsthand
14 knowledge as to -- I'll let her answer the -- answer the
15 question.

16 Separate from whether there's been testimony or
17 not, I'll leave that for the jury.

18 But if she understand the question, if she has
19 firsthand knowledge, she may answer.

20 A. I don't understand the question. What did you mean
21 by the relationship stopped?

22 BY MS. PROVINZINO:

23 Q. Okay. You have told the Government when you met with us
24 that Uncle Bill and uncle Maya ran the apartment together?

25 MR. RIVERS: Objection, leading.

1 THE COURT: Sustained as to the form.

2 BY MS. PROVINZINO:

3 Q. Did Uncle Bill and Maya -- tell the jury what you know,
4 if anything, about any partnership and any separation of the
5 partnership between Uncle Bill and Maya?

6 A. When I was working at Maya, Uncle Bill came, not as a
7 customer. At the time I thought if he wasn't her close
8 friend, then he would probably be a partner.

9 Q. And that's what you observed when you were working in
10 Orange County?

11 A. Yes.

12 Q. And stepping back, being part of the organization for
13 many years, did you learn anything more about any
14 partnership or separation of a partnership between Uncle
15 Bill and Maya?

16 A. That's what I heard.

17 Q. And so -- to be clear for the jury, Uncle Bill wasn't
18 there as a customer when you were working in Orange County?

19 A. No, he was not.

20 Q. And he knew it was a house of prostitution?

21 A. Yes.

22 Q. And, Iris, you were asked a lot of questions about the
23 law. Are you a lawyer?

24 A. No, I am not.

25 Q. Do you have any legal training?

1 A. No, I do not have.

2 Q. How far did you go in school, Iris?

3 A. I finished the 9th grade in Thailand.

4 Q. But you do have a lawyer here in the courtroom, is that
5 right?

6 A. Yes.

7 Q. And he advised you about the law as to sex trafficking
8 and money laundering, is that true?

9 A. Yes.

10 Q. And I'm not going to ask you about your conversations
11 with your lawyer. Because at the end of all of this, Judge
12 Frank is going to instruct the jury on what sex trafficking
13 is and what money laundering is.

14 A. Yes.

15 MR. GERDTS: Objection, Your Honor. It's not a
16 question, it's a statement.

17 THE COURT: Well, if you put a question in front
18 of the --

19 MS. PROVINZINO: All right.

20 BY MS. PROVINZINO:

21 Q. So let's stick with the facts and what you did.

22 THE COURT: I'll sustain the objection but we'll
23 proceed.

24 BY MS. PROVINZINO:

25 Q. So let's stick with the facts and what you did.

1 A. Yes.

2 Q. Now, you came to the United States under debt, is that
3 right?

4 A. Yes.

5 MR. GERDTS: Objection, leading.

6 THE COURT: Sustained as to the form.

7 BY MS. PROVINZINO:

8 Q. Who did you owe your debt to?

9 A. To M.

10 Q. And how long did it take to you pay off the debt?

11 A. 15 months.

12 Q. And did you have to pay off the debt?

13 A. Yes.

14 Q. Could you have walked away from the debt?

15 A. Yes.

16 MR. GUERRERO: Objection. Asked and answered.

17 MR. ENGH: Objection. Leading every question.

18 MR. RIVERS: Your Honor, can we approach, Your
19 Honor?

20 THE COURT: We can approach, briefly.

21 (Side bar at 11:46 a.m.)

22 MR. RIVERS: You know how on Sunday when you watch
23 football and there's holding on every play and they don't
24 catch it all the time? Well, they're leading questions.
25 Almost every single question.

1 And then when we object -- and we're not objecting
2 to every single one, and then when we object, the answer's
3 already out there.

4 So we would ask Counsel to quit asking leading
5 questions.

6 MS. PROVINZINO: And may I respond?

7 The last couple questions were how long did it
8 take to you pay off the debt? Could you have walked away?
9 Those don't imply or suggest answers.

10 MR. ENGH: Well, this is an endemic problem with
11 the case.

12 Every question is, Isn't it right? Is this fair?
13 Isn't this correct?

14 These are totally improper questions from the
15 Prosecution. All they have to do is direct testimony in the
16 right way by nonleading questions. And this is a problem
17 that's taken --

18 THE COURT: Multiple -- most of the questions have
19 been leading.

20 MR. ENGH: It's wrong. And it's error for her to
21 keep doing it.

22 And we'd like some kind of prophylactic -- that's
23 the wrong word in this case, but we'd like some kind of
24 remedy here, so we don't have to keep jumping up and down.

25 THE COURT: It is, Counsel. Most of the questions

1 have been leading.

2 The last two, were not. But most of them have
3 been.

4 MR. ENGH: It's -- you know, if you could listen
5 to your tape, and I don't want to talk to you personally,
6 but we can't continue this. This is just wrong.

7 MS. PROVINZINO: There were a series of questions
8 that were improper about the law that were asked on
9 cross-examination. And I'm attempting to respond by asking
10 and eliciting facts from this witness as to the force --
11 threats of force, fraud and coercion.

12 THE COURT: We can do that. But we have to
13 minimize the leading questions where the answer's in the
14 question.

15 MS. WILLIAMS: But certainly, Could you have
16 walked away? That doesn't imply an answer.

17 MR. ENGH: But this is a two-week problem.

18 THE COURT: I just said the last two questions
19 haven't been.

20 MS. PROVINZINO: We can proceed.

21 THE COURT: All right. Well -- and one thing,
22 I've had, separate from the position of these parties --
23 I've had some concerns, not unique to a case like this, if
24 because of the interpretation, well, are they truly
25 understanding?

1 MS. PROVINZINO: That's been a challenge.

2 THE COURT: -- the questions, some of the
3 definitions of the words. But I'll guess I'll leave that to
4 Counsel, all right.

5 (In open court at 11:49 a.m.)

6 THE COURT: Again, Members of the Jury you've
7 obviously heard me say this before. The lawyers have acted
8 consistent with the rules. Because as you've heard me say
9 before, contrary to the movies, and other things you see in
10 TV where everybody can just address the Court, say what they
11 want, whether it's facts or law, or following the rules,
12 that doesn't happen in real courtrooms in real life.

13 I know that's what you see on TV. But my point is
14 the lawyers have -- by approaching the bench, that's what
15 the rules require.

16 And as I've told you about, that's no, that's not
17 an accident then that we have a microphone up here, where
18 the sound comes on and nobody can hear, except those up here
19 and my Court Reporter, who can take everything down.

20 So if you have a concern, that should rest on my
21 shoulders, not on the lawyers.

22 So, we'll continue, consistent with our
23 discussion here.

24 BY MS. PROVINZINO:

25 Q. And while you were under debt, Iris, was there a point

1 that you wanted to leave?

2 A. Yes, there was.

3 Q. And tell the jury about that?

4 A. When I had been here in the U.S. for three, four
5 months, I was thinking to myself, I would never pay off
6 this debt because so far I had paid off less than
7 \$10,000. And so I asked that -- I wanted to go back home
8 to Thailand.

9 Q. Did you speak with M about that?

10 A. Yes, I did.

11 Q. And what did you tell her?

12 A. I told her I couldn't -- I couldn't work here any
13 longer. I wanted to go back to Thailand.

14 Q. How did she respond?

15 A. She said, Yes, I could go home. But she wouldn't
16 guarantee my -- the safety of my family if I wouldn't
17 come back to pay off the debt.

18 Q. Iris, how long would it have taken you to pay off that
19 debt if you had gone back to Thailand?

20 A. I couldn't give you the approximation as to this
21 amount of money, because this is a very -- this is a very
22 high -- this is a lot of money in Thailand.

23 Q. After you paid off your debt, did you continue working
24 for the organization?

25 A. Yes, I did.

1 Q. And what did you do?

2 A. I sell sex.

3 Q. What else did you do?

4 A. What else? I didn't do anything else.

5 Q. You talked yesterday about your work in relation to M,
6 is that right?

7 A. Yes.

8 Q. What did you do for M?

9 A. I gave -- I introduced the girls about how to bank,
10 how to go buy food at the supermarket and how to get
11 taxi.

12 Q. Are those things that helped the organization?

13 A. Yes.

14 Q. And then you even took another step and did something in
15 Atlanta, is that right?

16 MR. GERDTS: Objection, leading.

17 THE COURT: Sustained as to the form.

18 BY MS. PROVINZINO:

19 Q. And what else did you do for the organization?

20 A. I had -- my husband helped me in buying plane tickets
21 for the girls to go back to Thailand.

22 Q. So you bought tickets?

23 A. My husband did. I didn't buy it.

24 Q. And at some point you opened your own house, is that
25 right?

1 MR. GERDTS: Objection, leading.

2 THE COURT: I'll sustain as leading. Allow the
3 inquiry.

4 BY MS. PROVINZINO:

5 Q. And what are the different roles people play in the
6 organization, Iris?

7 A. I don't understand the question.

8 Q. Let's focus on Minnesota and the operation here.

9 A. Okay.

10 Q. Who had the debt? Who was the ma-tac?

11 A. I was in debt. M was my ma-tac.

12 Q. Who was the house boss?

13 A. M was.

14 Q. Did anyone help M?

15 A. There was.

16 Q. And would was that?

17 A. There were me and there's another customer named
18 John. There was some time Opal came in to help.

19 Q. And when you talk about John, what did he do?

20 A. John had helped the women to go to the bank and to
21 buy food.

22 Q. And those were all members of the conspiracy, is that
23 right?

24 MR. GERDTS: Objection, leading.

25 THE COURT: Sustained.

1 BY MS. PROVINZINO:

2 Q. And in addition to those people, are there others you
3 don't know involved in this?

4 MR. GERDTS: Objection on foundation grounds.

5 THE COURT: Okay. If she understand the question,
6 I'll allow her to answer this.

7 A. Yes, there were.

8 BY MS. PROVINZINO:

9 Q. And you done know everyone, is that right?

10 A. Yes.

11 Q. And while people were under debt, what did they have to
12 do?

13 MR. GERDTS: Your Honor, I object under 403 as
14 cumulative. We've gone over this before.

15 THE COURT: Well, in light of the direct, we've
16 been -- it's to an extent, but I'll permit it.

17 I'll permit it in context. You may answer it if
18 you understand the question.

19 A. They had to work off that debt.

20 MS. PROVINZINO: No further questions.

21 THE COURT: Any additional cross?

22 MR. SICOLI: This will take just a minute, Your
23 Honor.

24 THE COURT: All right.

25 R E C R O S S E X A M I N A T I O N

1 BY MR. SICOLI:

2 Q. Good morning, again.

3 A. Good morning, again.

4 Q. When you were in -- when you were in Orange County,
5 Uncle Bill was there for one day, is that correct?

6 A. I met him on the day he made me a steak. And then
7 again the next morning when he took me to buy cosmetics.

8 Q. So it's that night the steak, then the next day to buy
9 cosmetics and that's it, right?

10 A. Yes.

11 Q. You were asked questions on redirect that you were
12 wanting to leave, like when you were maybe four months into
13 debt, you wanted to leave but didn't leave, is that
14 correct?

15 A. Yes.

16 Q. And because you stayed on, you paid off your debt to M,
17 correct?

18 A. Yes.

19 Q. You continued to work after you paid off the debt,
20 correct?

21 A. Yes.

22 Q. You made more money, correct?

23 A. Yes.

24 Q. You paid off your family debt, correct?

25 A. Yes.

1 Q. You bought a house in Thailand, correct?

2 A. Yes.

3 Q. You bought a rice farm in Thailand, correct?

4 A. Yes.

5 Q. All for the benefit of your family, correct?

6 A. Yes.

7 Q. And you would have come to the United States earlier if
8 you knew you were going to make so much money, correct?

9 A. Yes.

10 MR. SICOLI: Thank you.

11 THE WITNESS: Thank you.

12 THE COURT: Mr. Engh?

13 MR. ENGH: I have no further questions.

14 R E C R O S S E X A M I N A T I O N

15 BY MR. GUERRERO:

16 Q. Ms. Boonluea, I have the sense, and you can correct me
17 if I'm wrong, but you had a pretty good relationship with M?

18 A. Yes, it was good.

19 Q. And you were close with her?

20 A. At some level.

21 Q. You consider her a friend?

22 A. No, she was not.

23 Q. Did you have discussions with her about which houses you
24 could go to?

25 A. Yes, there was.

1 Q. And so if you wanted to go someplace or you had certain
2 suggestions, she would allow you to do that?

3 A. Yes.

4 Q. And even after you paid off your debt, you still went
5 back to some of the houses you worked while you were under
6 debt?

7 A. Yes.

8 MR. GUERRERO: Thank you.

9 THE COURT: Mr. Gerdtz or Mr. Rivers, anything
10 additional?

11 MR. RIVERS: No questions.

12 MS. PROVINZINO: I don't have any further
13 questions, Your Honor.

14 THE COURT: You may step down. Thank you.

15 THE WITNESS: Thank you everyone.

16 THE COURT: Members of the jury, we will stand in
17 recess until 1:15. The time now is 12:00 or 12:01. So
18 please rise for the jury.

19 (Jurors excused at 12:00 p.m.)
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21
22
23
24
25

REPORTER'S CERTIFICATE

I, Lynne M. Krenz, do certify the foregoing pages of typewritten material constitute a full, true and correct transcript of my original stenograph notes, as they purport to contain, of the proceedings reported by me at the time and place hereinbefore mentioned.

/s/Lynne M. Krenz

Lynne M. Krenz, RMR, CRR, CRC

Date: November 23, 2018